



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date 12-6-05
Time Start 11:45
Time Finish 12:15 PM

Inspection # 1499485

HAZARDOUS WASTE INSPECTION REPORT

☒ GENERATOR

☐ S Q GENERATOR

Company name Powerex Inc I.D. Number PA0005000518

Site Address 200 Hillis St Youngwood, Pa

County Westmoreland Municipality Hempfield Zip 15697

Name of Inspector Gerald H. Snyder

Name & Title of Responsible Official Andy Varga

Person Interviewed Andy Varga Telephone (724) 925-4453

Mailing Address (if different from above) Same

Amount of Hazardous Waste Generated per Month: 15,100 Pounds Kgs

1. Site Characterization:

STORAGE: ☒ Container ☒ Tanks ☐ Containment Bldg. ☐ Drip Pad Other

PBR: ☒ Neutralization/WWTP ☐ Reclaim Other

GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad

2. Universal Waste: ☐ Large Quantity Handler ☒ Small Quantity Handler

Universal Waste Types

3. Hazardous Waste Transporters:

Transporter Name Enviroserve License Number AN 0548

Transporter Name Enviroserve License Number AN 6456

Transporter Name License Number

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
F006	liquid dextroplatin sludge	Enviroserve - Canton OH
F003/D001	mixed solvents	Chemtron - Avon OH
D001 etc	lab packs	Chemtron - Avon OH
D001 F003 F005	filter cake sludge	Chemical Solvents Inc - Cleveland OH
F006	mixed tank cleanout	Mich. Disposal Inc - OH
D001 F003 S1 D004 D003	EN / Gold plating bath filters	CSI - Cleveland OH
D003		Chemtron - Avon OH

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT

GENERATORS - SMALL QUANTITY GENERATORS

Site Name Powerex, Inc. ID Number PA00000518 Date 12-6-05

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
✓				Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
✓				Identification Number	262a.10	262.12	H002
✓				Authorized transporters only	262a.10	262.12(c)	H003
✓				Subsequent notification requirements met	262a.12(b)		H004
✓				Proper manifest used	262a.10	262.21	H005
✓				Manifests filled out correctly and completely	262a.20		H006
✓				Manifests signed and routed properly	262a.23(a)	262.23	H007
✓				Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
	✓			SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
	✓			SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
✓				Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
				Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
✓				Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
✓				Specified records retained for three years	262a.10	262.40(c)	H014
				Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
✓				Exception reporting procedures followed	262a.42	262.42	H016
✓				Spill reporting procedures followed	262a.10	262.34(d)	H017
✓				PPC plan developed and implemented	262a.10	262.34(a)	H018
	✓			Special requirements followed for international shipments	262a.10	262.50 262.60	H019
✓				Source reduction strategy prepared and available (LQG only)	262a.100		H020
✓				Excluded waste complies with exclusionary requirements	261a.4	261.4	H021

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS
FACILITY SPECIFICS

Site Name

Powerex Inc

ID Number

PA0005000578

Date

12-6-05

1 - No Violation Observed

2 - Not Applicable

3 - Not Determined

4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				CONTAINERS (Subchapter I)			
				Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
				Containers of hazardous waste in good condition	265a.1	265.171	H026
				Containers and stored waste compatible	265a.1	265.172	H027
				Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
				Containers managed to prevent leaks	265a.1	265.173(b)	H029
				Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
				Container storage areas inspected at least weekly	265a.1	265.174	H031
				Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
				Proper containment and collection systems in place	265a.179		H033
				Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
				Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
				Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
				Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS
FACILITY SPECIFICS

Site Name Powerex Inc ID Number PA05000518 Date 12-6-05
1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
			LQG TANKS (Subchapter J)			
✓			Tanks labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H040
✓			Written certification by registered professional engineer for proper tank (system) design and installation on file	262a.10	265.192(a)	H041
✓			Secondary containment provided for tanks (systems) as required	265a.193	265.193	H042
✓			Tanks (systems) managed to prevent rupture, leak, corrode or fail	265a.1	265.194	H043
✓			Tanks labeled to accurately identify contents	265a.194		H044
✓			Required inspections completed and documented in operating log	265a.195	265.195	H045
✓			Release reported to Department within 24 hours, unless exempted	265a.1	265.196	H046
✓			Special requirements for ignitable and reactive wastes followed	265a.1	265.198	H047
✓			Special small quantity generator requirements	265a.1	265.201	H048
			<i>AA BB (CC)</i>		<i>265.202</i>	
			SQG TANKS			
✓			Waste contents compatible with tank	265a.1	265.201(b)(2)	H051
			Uncovered tanks operated with 2 feet of freeboard or equivalent containment capacity	265a.1	265.201(b)(3)	H052
			If continuously fed, tank has method to stop inflow	265a.1	265.201(b)(4)	H053
			Daily tank inspection requirements complied with	265a.1	265.201(c)(1-3)	H054
			Weekly tank inspection requirements complied with	265a.1	265.201(c)(4,5)	H055
			All waste removed at closure	265a.1	265.201(d)	H056
			Special requirements for ignitable or reactive waste complied with	265a.1	265.201(e)(1)	H057
			Covered tank buffer zone requirements complied with	265a.1	265.201(e)(2)	H058
			Incompatible waste requirements met	265a.1	265.201(f)	H059

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 12-6-05 Identification Number PA D00500051

Company/Facility/Site Name

Powerex Inc.Observations

A following inspection of this hazardous waste large quantity generator was completed with Andy Varga today. Records of daily inspections of the mixed waste storage tank were reviewed. Starting July 17, 2005 the solvent tank was added to the list of stops for the facility guards. Recent daily guard reports confirm daily inspections of this tank. This corrects the violation of 12-14-04, Section 265.195(c).

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the persons interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed

Andrea Varg
(Signature)

Date

12/6/05

Inspector

Sevill Thompson
(Signature)

Date

12-6-05

Guard Round Report from 07/18/2005 To 07/25/2005

Station Id	Location	Inside/Outside	Scan Date&Time
Round Started on 07/17/2005 @06:29:53 Uploaded on 07/18/2005 @08:04:30			
57	SECURITY OFFICE	Inside	Sunday, 07 17, 2005 6:30AM
49	EQUIPMENT ROOM	Inside	Sunday, 07 17, 2005 9:09AM
47	EAST STAIRWELL 1ST FLOOR	Inside	Sunday, 07 17, 2005 9:12AM
48	SAND BLAST AREA	Inside	Sunday, 07 17, 2005 9:13AM
32	DOCK AREA	Inside	Sunday, 07 17, 2005 9:14AM
51	WEST STAIRWELL 2ND FLOOR	Inside	Sunday, 07 17, 2005 10:48AM
52	2ND FLOOR CONFERENCE ROOM	Inside	Sunday, 07 17, 2005 10:50AM
53	NORTH PENTHOUSE	Inside	Sunday, 07 17, 2005 10:52AM
59	HAZARDOUS WASTE DISPOSAL AREA	Inside	Sunday, 07 17, 2005 10:53AM
54	NORTH PLENUM	Inside	Sunday, 07 17, 2005 10:54AM
55	PLAGING AREA	Inside	Sunday, 07 17, 2005 10:55AM
46	BRIDGE LINE	Inside	Sunday, 07 17, 2005 10:56AM
50	DI WATER	Inside	Sunday, 07 17, 2005 11:17AM
25	SECURITY OFFICE	Outside	Sunday, 07 17, 2005 6:30AM
36	GAS FARMS	Outside	Sunday, 07 17, 2005 7:02AM
58	MIXED SOLVENT TANK	Outside	Sunday, 07 17, 2005 7:03AM
37	WASTE TREATMENT (DOWNSTAIRS)	Outside	Sunday, 07 17, 2005 8:53AM
1	WASTE TREATMENT (OFFICE)	Outside	Sunday, 07 17, 2005 8:54AM
43	SOUTH PLENUM	Outside	Sunday, 07 17, 2005 10:42AM
44	ENTRANCE 2ND FLOOR	Outside	Sunday, 07 17, 2005 10:44AM
45	SOUTH PENTHOUSE	Outside	Sunday, 07 17, 2005 10:46AM
38	ENTRANCE ADMIN BLDG (ASSOCIATE	Outside	Sunday, 07 17, 2005 11:13AM
39	CEO OFFICE	Outside	Sunday, 07 17, 2005 11:14AM
41	MAIL ROOM DOOR	Outside	Sunday, 07 17, 2005 11:14AM
40	BREAK AREA	Outside	Sunday, 07 17, 2005 11:15AM



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date 12-14-04
Time Start 10:00 AM
Time Finish 3:00 PM

Inv # 1402860

HAZARDOUS WASTE INSPECTION REPORT

☒ GENERATOR

☐ S Q GENERATOR

Company name Powerex Inc I.D. Number PA0005000518

Site Address 200 Hillis St. Youngwood, Pa

County Westmoreland Municipality Hempfield ZIP 15697

Inspector Gerald A. Snyder & Jeff Dodd, USEPA

Name & Title of Responsible Official Andy Varga

Person Interviewed Andy Varga & Don Elder Telephone (724) 925-4453

Mailing Address (if different from above) same

Amount of Hazardous Waste Generated per Month: 15,100 Pounds _____ Kgs

1. Site Characterization:

STORAGE: ☒ Container ☒ Tanks ☐ Containment Bldg. ☐ Drip Pad Other _____

PBR: ☒ Neutralization/WWTP ☐ Reclaim Other _____

GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad

2. Universal Waste: ☐ Large Quantity Handler ☒ Small Quantity Handler

Universal Waste Types _____

Hazardous Waste Transporters:

Transporter Name Enviro-ite License Number AH 0548

Transporter Name Enviroserve License Number AH 6456

Transporter Name _____ License Number _____

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description ^{minimater treatment}	Destination Facility
F006	liquid dichloroethane sludge	Enviro-ite - Canton OH
F003/D001	mixed solvents	Chemtron - Avon OH
D001 etc	lab packs	Chemtron - Avon OH
D001 F003 F005		Chemical Solvents Inc - cleve
F006	filter cake sludge	Mich. Disposal Inc -
D001 F003 1 D004 0039	mixed tank cleanout	CSI - Cleveland, OH
D003	CN / Gold plating bath filters	Chemtron - Avon OH

COMMONWEALTH OF PENNSYLVANIA
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BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name Powerex, Inc. ID Number PA00500518 Date 12-14-04

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
✓				Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
✓				Identification Number	262a.10	262.12	H002
✓				Authorized transporters only	262a.10	262.12(c)	H003
✓				Subsequent notification requirements met	262a.12(b)		H004
✓				Proper manifest used	262a.10	262.21	H005
✓				Manifests filled out correctly and completely	262a.20		H006
✓				Manifests signed and routed properly	262a.23(a)	262.23	H007
✓				Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
	✓			SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
	✓			SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
✓				Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
				Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
✓				Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
✓				Specified records retained for three years	262a.10	262.40(c)	H014
				Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
✓				Exception reporting procedures followed	262a.42	262.42	H016
✓				Spill reporting procedures followed	262a.10	262.34(d)	H017
✓				PPC plan developed and implemented	262a.10	262.34(a)	H018
	✓			Special requirements followed for international shipments	262a.10	262.50 262.60	H019
✓				Source reduction strategy prepared and available (LQG only)	262a.100		H020
✓				Excluded waste complies with exclusionary requirements	261a.4	261.4	H021

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BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS
FACILITY SPECIFICS

Site Name Powerex Inc ID Number PAD005000518 Date 12-14-04

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
			CONTAINERS (Subchapter I)			
/	/		Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
/	/		Containers of hazardous waste in good condition	265a.1	265.171	H026
/	/		Containers and stored waste compatible	265a.1	265.172	H027
/	/		Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
/	/		Containers managed to prevent leaks	265a.1	265.173(b)	H029
/	/		Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
/	/		Container storage areas inspected at least weekly	265a.1	265.174	H031
/	/		Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
/	/		Proper containment and collection systems in place	265a.179		H033
/	/		Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
/	/		Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
/	/		Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
/	/		Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS
FACILITY SPECIFICS

Site Name Powerex Inc ID Number PA1005000518 Date 12-14-04
1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
				LQG TANKS (Subchapter J)			
✓				Tanks labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H040
✓				Written certification by registered professional engineer for proper tank (system) design and installation on file	262a.10	265.192(a)	H041
✓				Secondary containment provided for tanks (systems) as required	265a.193	265.193	H042
✓				Tanks (systems) managed to prevent rupture, leak, corrode or fail	265a.1	265.194	H043
✓				Tanks labeled to accurately identify contents	265a.194		H044
		✓		Required inspections completed and documented in operating log	265a.195	265.195	H045
✓				Release reported to Department within 24 hours, unless exempted	265a.1	265.196	H046
✓				Special requirements for ignitable and reactive wastes followed	265a.1	265.198	H047
✓				Special small quantity generator requirements	265a.1	265.201	H048
				AA BB (CC)		265.202	
				SQG TANKS			
✓				Waste contents compatible with tank	265a.1	265.201(b)(2)	H051
				Uncovered tanks operated with 2 feet of freeboard or equivalent containment capacity	265a.1	265.201(b)(3)	H052
				If continuously fed, tank has method to stop inflow	265a.1	265.201(b)(4)	H053
				Daily tank inspection requirements complied with	265a.1	265.201(c)(1-3)	H054
				Weekly tank inspection requirements complied with	265a.1	265.201(c)(4,5)	H055
				All waste removed at closure	265a.1	265.201(d)	H056
				Special requirements for ignitable or reactive waste complied with	265a.1	265.201(e)(1)	H057
				Covered tank buffer zone requirements complied with	265a.1	265.201(e)(2)	H058
				Incompatible waste requirements met	265a.1	265.201(f)	H059

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 12-14-04 Identification Number PAD005000518Company/Facility/Site Name Powerex, Inc.

a) Observations

A routine inspection was conducted by Jeff Dodd, USEPA - Wheeling WV Off. on this date at Powerex. While accompanying him, I completed a followup inspection to my 10-18-04 hazardous waste inspection. The three outstanding violations involved an annual inspection of the mixed waste solvent tank and the hazardous waste determination for the gold plating bath tank filter waste. A review of 40 CFR Section 265.1089, "Inspection and monitoring requirements" requires that the owner of a Subpart CC tank shall develop and implement a written plan and schedule to perform inspection and monitoring so as to comply with 265.1085 thru 265.1088. Section 265.195(a) requires that the tank owner or operator must inspect, where present at least once each operating day, the following: Overfill, spill control equipment, the aboveground portions of the tank system & the secondary containment structure. This must be documented in the operating record. Andy Varga provided me with a copy of the mixed waste storage tank inspection

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the persons interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed _____

Date _____

(Signature)

Inspector _____

(Signature)

Date 12-14-04

COMMONWEALTH OF PENNSYLVANIA
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BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection

12-14-04

Identification Number

PA0005000518

Company/Facility/Site Name

Powerex, Inc

Observations (Cont.)

report dated 8-25-04 the date of the second tank removal. He indicates that "all okay - Cleared & emptied." This should be replaced with a daily report.

The second violation addressed by this inspection involved the HLL determination for the cyanide bearing gold plating bath filters. The FAX date of 12-08-04 is presumed to be the date that this was corrected. This is now classified as a D003 F008. My inspection today confirms that this tank is continuously agitated and filtered to remove all solids.

The facility inspection identified that the F006 tank was properly marked "Hazardous Waste, F006". The HLL container accumulation area drums were properly marked & dated.

A record review of the training records was completed by Jeff Dodd & I. They appeared to be satisfactory, except that annual updated training has not been provided or documented.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

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Signature by the persons interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed

Date

(Signature)

Inspector

(Signature)

Date

12-15-04

Page _ of _

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection

12-14-04

Identification Number

PAD00500054

Company/Facility/Site Name

Powerex, Inc

Observations

Powerex may use one of their monthly safety meetings to provide health & safety training as it relates to the generation, storage & record keeping of hazardous wastes. The individual that contact hazardous wastes should be tracked to verify that they have received the annual training.

Previous violations were correct.
Key violation:

1) Daily inspections of the mixed waste solvents storage tank should be recorded. This is a violation of 40 CFR, Section 265.195 as incorporated by reference in 25 Pa Code Section 265a.195. You should immediately begin to record these inspections in your daily records.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

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Signature by the persons interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed

Andrew B. Vay
(Signature)

Date

12/16/04

Inspector

Paula M. Snyder
(Signature)

Date

12-15-04



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date

1-12-04

Time Start

Time Finish

HAZARDOUS WASTE INSPECTION REPORT

☒ GENERATOR☐ S Q GENERATOR

Company name

Powerex Inc

I.D. Number

PA0005000518

Site Address

200 Hillis St, Greenwood, Pa

County

Westmoreland

Municipality

Hempfield Twp.

15697

Name of Inspector

Gerald J. Tringali

Name & Title of Responsible Official

Andy Varga

Person Interviewed

Andy Varga & Don Elder

Telephone

724 925-4453

Mailing Address (if different from above)

Same

Amount of Hazardous Waste Generated per Month:

Pounds

Kgs

Site Characterization:

STORAGE:

☒ Container☒ Tanks☐ Containment Bldg.☐ Drip Pad

Other

PBR:

☒ Neutralization/WWTP☐ Reclaim

Other

GENERATOR TREATMENT

☐ Containers☐ Tanks☐ Containment Bldg.☐ Drip Pad2. Universal Waste: ☐ Large Quantity Handler☒ Small Quantity Handler

Universal Waste Types

3. Hazardous Waste Transporters:

Transporter Name

Pure Tech System

License Number

AH-0647

Transporter Name

D.S. Liquids

License Number

AH-0651

Transporter Name

Chemical Solvents

License Number

AH-0049

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
D001/F003	mixed solvents	Pure Tech Systems
	pentachlorinated solvents	
F001	in Lexol degreaser solvent	Cleveland, OH
F006	liquid sludge	Enviro-ite - Canton, OH
D001 etc	lab packs	Chemtron - Avon, OH

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name

Powerex, Inc

ID Number

PA0005000518

Date

1-12-04

1 - No Violation Observed

2 - Not Applicable

3 - Not Determined

4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
✓				Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
✓				Identification Number	262a.10	262.12	H002
✓				Authorized transporters only	262a.10	262.12(c)	H003
✓				Subsequent notification requirements met	262a.12(b)		H004
✓				Proper manifest used	262a.10	262.21	H005
✓				Manifests filled out correctly and completely	262a.20		H006
✓				Manifests signed and routed properly	262a.23(a)	262.23	H007
✓				Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
	✓			SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
	✓			SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
✓				Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
✓				Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
✓				Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
✓				Specified records retained for three years	262a.10	262.40(c)	H014
✓				Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
✓				Exception reporting procedures followed	262a.42	262.42	H016
✓				Spill reporting procedures followed	262a.10	262.34(d)	H017
✓				PPC plan developed and implemented	262a.10	262.34(a)	H018
	✓			Special requirements followed for international shipments	262a.10	262.50 262.60	H019
✓				Source reduction strategy prepared and available (LQG only)	262a.100		H020
✓				Excluded waste complies with exclusionary requirements	261a.4	261.4	H021

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS
FACILITY SPECIFICS

Site Name

Powerex, Inc

ID Number

PA005000518

Date

1-12-04

1 - No Violation Observed

2 - Not Applicable

3 - Not Determined

4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				CONTAINERS (Subchapter I)			
/				Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
/				Containers of hazardous waste in good condition	265a.1	265.171	H026
/				Containers and stored waste compatible	265a.1	265.172	H027
				Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
/				Containers managed to prevent leaks	265a.1	265.173(b)	H029
/				Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
/				Container storage areas inspected at least weekly	265a.1	265.174	H031
/				Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
/				Proper containment and collection systems in place	265a.179		H033
			/	Air emission standards complied with (AA, BE, CC)	265a.1	265.178	H034
/				Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
/				Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
				Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS
FACILITY SPECIFICS

Site Name

Powerex Inc

ID Number

PA005000518

Date

1-12-04

1 - No Violation Observed

2 - Not Applicable

3 - Not Determined

4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
				LQG TANKS (Subchapter J)			
/				Tanks labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H040
/				Written certification by registered professional engineer for proper tank (system) design and installation on file	262a.10	265.192(a)	H041
/				Secondary containment provided for tanks (systems) as required	265a.193	265.193	H042
/				Tanks (systems) managed to prevent rupture, leak, corrode or fail	265a.1	265.194	H043
/				Tanks labeled to accurately identify contents	265a.194		H044
/				Required inspections completed and documented in operating log	265a.195	265.195	H045
/				Release reported to Department within 24 hours, unless exempted	265a.1	265.196	H046
/				Special requirements for ignitable and reactive wastes followed	265a.1	265.198	H047
/				Special small quantity generator requirements	265a.1	265.201	H048
				<u>AA, BB, (CC)</u>		<u>265.202</u>	
				SQG TANKS			
/				Waste contents compatible with tank	265a.1	265.201(b)(2)	H051
/				Uncovered tanks operated with 2 feet of freeboard or equivalent containment capacity	265a.1	265.201(b)(3)	H052
/				If continuously fed, tank has method to stop inflow	265a.1	265.201(b)(4)	H053
/				Daily tank inspection requirements complied with	265a.1	265.201(c)(1-3)	H054
/				Weekly tank inspection requirements complied with	265a.1	265.201(c)(4,5)	H055
/				All waste removed at closure	265a.1	265.201(d)	H056
/				Special requirements for ignitable or reactive waste complied with	265a.1	265.201(e)(1)	H057
/				Covered tank buffer zone requirements complied with	265a.1	265.201(e)(2)	H058
/				Incompatible waste requirements met	265a.1	265.201(f)	H059

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name _____ ID Number _____ Date _____

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
				Containment Buildings (Subchapter T)			
				Building completely enclosed to prevent exposure to the elements	265a.1	265.1101(a)(1)	H061
				Meets special requirements if liquids present	265a.1	265.1101(b)	H062
				Primary barrier free of significant gaps, cracks and deterioration	265a.1	265.1101(c)(1) (i)	H063
				Level of hazardous waste within unit is below containment walls	265a.1	265.1101(c)(1) (ii)	H064
				Tracking of waste out of unit by equipment or personnel prevented	265a.1	265.1101(c)(1) (iii)	H065
				No visible dust emissions at doors, windows, vents, etc.	265a.1	265.1101(c)(1) (iv)	H066
				Professional engineer's certification placed in operating record	265a.1	265.1101(c)(2)	H067
				Required inspections performed and logged in operating record	265a.1	265.1101(c)(4)	H068
				Drip Pads (Subchapter S)			
				Engineer's certification of existing drip pads on file	265a.1	265.441(a)	H069
				Drip pad meets 265.443 design & operating standards	265a.1	265.443	H070
				(a) nonearthen, sloped construction with berm to channel associated drippage to collection system	265a.1	265.443(a)	H071
				(b) Has synthetic liner below the pad with properly constructed leak detection system	265a.1	265.443(b)	H072
				Drip pads & collection system maintained to prevent deterioration	265a.1	265.443(c)	H073
				Drip pads & collection systems designed to prevent run-off	265a.1	265.443(d)	H074
				Run-on/run-off control system maintained unless pad protected by a structure	265a.1	265.443(e)	H075
				Release reporting requirements met	265a.1	265.443(m)	H076
				Drip pads inspected weekly and after storms when in operation	265a.1	265.444(b)	H077

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection

1-12-04

Identification Number

PAD005000 51

Company/Facility/Site Name

Powerex, Inc.

Observations

On 7-24-03 the manifest exception report was completed for the 9-24-01 and 12-22-01 manifests. This violation that was cited on my 12-16-02 inspection was corrected upon receipt by the Dept. The Air Emissions Checklist violations to AA, BB, CC of the Hazardous Waste Regulations were reviewed during this inspection. The storage of mixed solvent waste that exceeds 500 ppmw in a tank requires the generator to comply with Section 265.202 of the 40 CFR's. The generator was notified of this on 2-10-03 as a followup to my 1-15-03 inspection. Mr. Varga indicates that an inspection was done last January, but no report was completed. The waste determination of the mixed solvent waste stream for average VOC concentration, as specified in 265.1084(a) was reviewed on this date. Don Elder verified that the mixed solvent would exceed the 500 ppmw level. Powerex should maintain a record of this waste determination and should review this by analysis or knowledge.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

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Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature)

Date

Inspector (signature)

Date

Gerard J. O'Connell 1-26-04



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Hazardous Waste Inspection Report
Hazardous Waste Permit by Rule Facility

Company name

I.D. Number

Determination of Applicability Required? 270a.60

Documentation Available?

Does facility accept wastes from off-site for treatment in the PBR system?

Does facility have an NPDES permit?

If yes, NPDES Permit Number

If no, does facility discharge to a sewage treatment system with an NPDES permit? If yes, NPDES Permit Number

If yes, does system meet all Federal, State and local pretreatment standards?

Yes ☒ No ☐ N.D. ☐
 Yes ☐ No ☐ N.D. ☒
 Yes ☐ No ☒ N.D. ☐
 Yes ☒ No ☐ N.D. ☐
 Yes ☐ No ☐ N.D. ☐ NA
 Yes ☒ No ☐ N.D. ☐

If system does not directly discharge to a POTW or its own NPDES permitted discharge, explain here.

Site Name

ID Number

Date

Hazardous Waste Inspection Report
Hazardous Waste Permit by Rule Facility (WWTP)

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NUMBER
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Facility has applied for or received an EPA Hazardous Waste Identification Number	264a.1	264.11	H550
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Active portion has 24 hour surveillance	264a.1	264.14(b)(1)	H551
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Artificial barrier surrounds active portion	264a.1	264.14(b)(2)	H552
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Proper signs are posted	264a.1	264.14(c)	H553
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Inspections are conducted as per inspection plan	264a.1	264.14(b)(1)	H554
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Inspection schedule is retained at facility	264a.1	264.15(b)(2)	H555
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Deterioration and/or malfunctions of equipment corrected as revealed by inspections	264a.1	264.15 (c)	H556
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Immediate remedial action taken when a hazard is imminent or already present	264a.1	264.15(c)	H557
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Inspection log is maintained and utilized properly	264a.1	264.15 (d)	H558
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Personnel training plan approved by DEP and implemented	264a.1	264.16 (a)	H559

1-12-04

Hazardous Waste Inspection Report

Hazardous Waste Permit by Rule Facility (WWTP)

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1 2 3 4				REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NUMBER
✓				Facility has NPDES permit if required	264a.1	264.16(d)(e)	H560
✓				Facility is equipped with internal alarm system capable of providing immediate emergency instruction to personnel	264a.1	264.32(a)	H561
✓				Facility is capable of summoning outside emergency assistance	264a.1	264.32(b)	H562
✓				Facility is equipped with fire, spill and decontamination control equipment	264a.1	264.32(c)	H563
✓				Facility communication and/or alarm systems, and spill and decontamination control equipment is periodically tested and maintained	264a.1	264.33	H564
✓				Adequate aisle space is maintained to allow unrestricted access for personnel and emergency equipment	264a.1	264.35	H565
✓				Current PPC plan, prepared and implemented in accordance with Department's guidelines. Copy available on site.	264a.1	264.51	H566
✓				Designated primary emergency coordinator and is on-site or on call at all times	264a.1	264.55	H567

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection

1-12-04

Identification Number

PAD005000518

Company/Facility/Site Name

Powerex, Inc.

Observations (cont.)

on an annual basis.

One of the two mixed waste solvent storage tanks has not been used for several years. However, there is no record of a RCRA closure of this tank in accordance with the requirements of Subpart G - Closure and Post Closure Requirements of 40 CFR, Sections 265.110 & 121.4M. Hanga verifies that this tank is empty, and therefore is exempted from the requirements of Subpart CC (4500 ppmw). A closure plan should have been submitted for this tank within 90 days of receipt of last amount of hazardous waste.

The mixed waste solvent storage tank does not appear to have a closure device on the vent pipe that meets the requirement specified in 265.1085(C)(2). A spring loaded pressure relief valve, conservation vent, or similar device which controls VO from venting to the atmosphere is allowed during normal operations to maintain the tank's internal pressure within the tank's design specifications. For tanks with level 1 controls, you are required to have closure

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Person Interviewed

Date

(Signature)

Inspector

(Signature)

Date

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection

1-26-04

Identification Number

PAD005000518

Company/Facility/Site Name

Powerex, Inc.

Observations (Cont.)

devices that operate with no detectable organic vapor emissions, except when filling or emptying.

Industrial wastewater that includes wastewater from the electroplating operation is managed by Powerex as F006 hazardous waste. It is not managed as a residual waste. The monthly average flow rates and peak monthly flow rates are recorded on the DPR's for their NPDES report. The F006 liquid sludge that is presently transported to Enbridge for disposal is a combination of industrial and sanitary sludges. An inspection of this hazardous waste permit by only treatment facility was completed today. Records are maintained of measurements taken by the plant operator and by automatic continuous monitoring equipment. A recent electrical malfunction by the power company has damaged some of this equipment which was subsequently replaced. Data for the missing period will be calculated.

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Person Interviewed

Date

(Signature)

Inspector

(Signature)

Date

1-26-04

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection

1-12-04

Identification Number

PAD00500051

Company/Facility/Site Name

Powerex, Inc

Observations

as needed to properly complete the DMR's. All F006 is presently being shipped as a liquid. Plate press is operational but not used presently. Site security gate is intact.

Violations:

- 1) The active mixed waste solvent storage tank does not have an approved closure device on the vent pipe off of the tank. Powerex should provide documentation that an approved closure device has been installed on this tank. This is a violation of section 265.1085(c)(2) and 265.202 as of 12-6-96. Powerex was responsible for inspecting the mixed waste solvent storage tank on an annual basis. No inspection reports are available for Dec. 2002 or Dec. 2003. If inspections were completed for the past two years you should provide reports that identifies any problems found and corrective action. This is a violation of 40 CFR section 265.1085(c)(3) & (4) and 265.202, as incorporated by reference in 25 Pa Code 265.178.

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Person Interviewed

mailed

Date

1-28-04

(Signature)

Inspector

Gerald A. Snyder

(Signature)

Date

1-28-04



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date

Time Start

Time Finish

HAZARDOUS WASTE INSPECTION REPORT

☒ GENERATOR☐ S Q GENERATOR

Company name Powerex, Inc. I.D. Number PA 0005000518
 Site Address 200 Stillis St. Youngwood Pa 15697
 County Westmoreland Municipality Hempfield Zip 15697
 Name of Inspector Gerald Trujillo
 Name & Title of Responsible Official Andy Varga
 Person Interviewed Andy Varga Telephone (724) 925-4453
 Mailing Address (if different from above) Same

Amount of Hazardous Waste Generated per Month: _____ Pounds _____ Kgs

Site Characterization:

STORAGE: ☒ Container ☒ Tanks ☐ Containment Bldg. ☐ Drip Pad Other _____

PBR: ☒ Neutralization/WWTP ☐ Reclaim Other _____

GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad

2. Universal Waste: ☐ Large Quantity Handler ☒ Small Quantity Handler

Universal Waste Types _____

3. Hazardous Waste Transporters:

1) Transporter Name Enviro of Ohio License Number AH 0548
 2) Transporter Name EAP Industries Inc License Number AH 0660
 3) Transporter Name Pure Tech License Number AH 0647

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
F006	solid & liq. waste ^{sludge} electroplating	Enviro - Canton OH
D001 D002 D003	lab packs	Chemtron, Avon OH
D021, D029 F001, F003	"	
D001, F003	mixed solvents	Pure Tech Systems cleveland
" "	"	General Env. Mgt. (new na)
F001	spent chlorinated solvents ^{in Lexol}	Cleveland Solvent, Cleveland

addl. transporters:

4) U.S. Liquids AH 0651

8) Enviroserve JV AH-0456

5) Metropolitan Env, Inc. AH 0289

9) Chemical Solvents AH-001

6) Dart AH-0219

Page _____ of _____

7) Emerald Env. Services AH-0641

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT

GENERATORS -- SMALL QUANTITY GENERATORS

Site Name Powerex, Inc ID Number PA0005000518 Date 1-15-03

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
				Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
✓				Identification Number	262a.10	262.12	H002
✓				Authorized transporters only	262a.10	262.12(c)	H003
✓				Subsequent notification requirements met	262a.12(b)		H004
✓				Proper manifest used	262a.10	262.21	H005
✓				Manifests filled out correctly and completely	262a.20		H006
✓				Manifests signed and routed properly	262a.23(a)	262.23	H007
✓				Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
	✓			SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
	✓			SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
✓				Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
✓				Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
				Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
✓				Specified records retained for three years	262a.10	262.40(c)	H014
				Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
				Exception reporting procedures followed	262a.42	262.42	H016
✓				Spill reporting procedures followed	262a.10	262.34(d)	H017
✓				PPC plan developed and implemented	262a.10	262.34(a)	H018
	✓			Special requirements followed for international shipments	262a.10	262.50 262.60	H019
✓				Source reduction strategy prepared and available (LQG only)	262a.100		H020
✓				Excluded waste complies with exclusionary requirements	261a.4	261.4	H021

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS
FACILITY SPECIFICS

Site Name

Powerex, Inc

ID Number

PA D005000518

Date

1-15-03

1 - No Violation Observed

2 - Not Applicable

3 - Not Determined

4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				CONTAINERS (Subchapter I)			
/				Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
/				Containers of hazardous waste in good condition	265a.1	265.171	H026
/				Containers and stored waste compatible	265a.1	265.172	H027
/				Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
/				Containers managed to prevent leaks	265a.1	265.173(b)	H029
/				Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
/				Container storage areas inspected at least weekly	265a.1	265.174	H031
/				Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
/				Proper containment and collection systems in place	265a.179		H033
/				Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
/				Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
/				Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
/				Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS
FACILITY SPECIFICS

Site Name Powerex Inc ID Number PA0005000518 Date 1-15-03
1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
				LQG TANKS (Subchapter J)			
✓				Tanks labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H040
✓				Written certification by registered professional engineer for proper tank (system) design and installation on file	262a.10	265.192(a)	H041
✓				Secondary containment provided for tanks (systems) as required	265a.193	265.193	H042
✓				Tanks (systems) managed to prevent rupture, leak, corrode or fail	265a.1	265.194	H043
✓				Tanks labeled to accurately identify contents	265a.194		H044
✓				Required inspections completed and documented in operating log	265a.195	265.195	H045
✓				Release reported to Department within 24 hours, unless exempted	265a.1	265.196	H046
✓				Special requirements for ignitable and reactive wastes followed	265a.1	265.198	H047
	✓			Special small quantity generator requirements	265a.1	265.201	H048
		✓		<u>AA, BB, CC</u>		<u>265.202</u>	
				SQG TANKS			
	✓			Waste contents compatible with tank	265a.1	265.201(b)(2)	H051
		✓		Uncovered tanks operated with 2 feet of freeboard or equivalent containment capacity	265a.1	265.201(b)(3)	H052
			✓	If continuously fed, tank has method to stop inflow	265a.1	265.201(b)(4)	H053
			✓	Daily tank inspection requirements complied with	265a.1	265.201(c)(1-3)	H054
			✓	Weekly tank inspection requirements complied with	265a.1	265.201(c)(4,5)	H055
			✓	All waste removed at closure	265a.1	265.201(d)	H056
			✓	Special requirements for ignitable or reactive waste complied with	265a.1	265.201(e)(1)	H057
			✓	Covered tank buffer zone requirements complied with	265a.1	265.201(e)(2)	H058
			✓	Incompatible waste requirements met	265a.1	265.201(f)	H059

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 1-15-03 Identification Number PAD 005000518
Company/Facility/Site Name Powerex Inc

cond 1
On 1-15-03 records were reviewed to verify that the 9-24-01 and 2-22-01 manifests were delivered on 9-24-01 and 2-23-01 respectively. Manifest exception reports have not been received from the generator yet.

The US EPA Air Emissions - Subpart AA, BB, CC Checklist was reviewed and the mixed waste storage tank was inspected. The fill pipe inside the building has a lid that acts as a closure device to minimize volatile organic emissions. The tank has a plug that is removed to allow pumping of waste solvent into a tank truck. The tank is also equipt with a open vented pipe thru the roof of the enclosure (no side walls). There is no closure device on this pipe. These tanks have operated since prior to 12-6-96. Only one is used, but the second tank is not a closed tank (ie not RCRA cleaned). A volatile organics analysis of the mixed waste or a determination based upon knowledge has not been completed. It is presumed to exceed 500ppm w.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) _____ Date _____
Inspector (signature) Gerard J. Nyari Date 2-10-03

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection

1-15-03

Identification Number

PAD 005000.548

Company/Facility/Site Name

Powerex Inc

The tanks have not been inspected annually nor recorded. A calculation of the maximum organic vapor pressure for the solvent mix has been submitted on 1-15-03 by email. On 2-10-03 the checklist was reviewed for applicability and completeness. Section AA and BB do not appear to apply to this facility. Section CC applies to the storage of hazardous wastes in tanks and containers. The following violations apply to the Air Emissions Checklist.

- 1) Powerex has not determined the average volatile organic concentration of the mixed waste solvents as required by 26 Pa.C.S. 1084(a). This can be done by a direct measurement or by knowledge as specified in section (a)(4).
- 2) The tanks (2) have a closure device on the fill pipe, but not on the open vent pipe. The second tank if not RCRH closed can be capped and inspected annually. The installation of a spring-loaded, pressure relief valve, conservation vent or similar device which vents to the atmosphere is allowed during normal operations for the purpose of maintaining

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Person Interviewed

Date

(Signature)

Inspector

Date

(Signature)

Page 1 of 1



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COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection

1-15-03

Identification Number

PA0005000518

Company/Facility/Site Name

Powerex, Inc

CC Violation (cont)

2) (cont) the tank internal pressure in accordance with the tank design specifications. For tanks with level 1 controls, you are required to have closure devices that operate with no detectable organic emissions. Sect 265.1085(c)(2)

3) Effective on 12-6-96 you were required to implement all of the above requirements including inspections of the tanks and closure devices annually. Section 265.1084(d) identifies the procedure to be used to inspect all parts of the tank to confirm that there are no detectable organic emissions. This should be completed immediately and annually thereafter. A record of the results of this inspection should be retained for at least 3 years. This is a violation of 40 CFR Section 265.1085(c)(3)&(4) as incorporated by reference in 25 Pa Code Section 265.1780.

The above inspection are authorized under 265.202

(cont)

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Person Interviewed

Date

(Signature)

Inspector

Date

(Signature)

Page _ of _

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection

1-15-03

Identification Number

PAD005000518

Company/Facility/Site Name

Powerex Inc

Violations remaining from 12-16-02

1) Manifest exception reports have not been completed for a 2-22-01 and a 9-24-01 shipments. If the signed copy 3 is not returned within 35 days of the shipment date then the generator is required to send an exception report to the DEP. (Hbz) to identify the status of that shipment within 45 days. This is a violation of 40 CFR Section 262.40(a) as incorporated by reference in 25 Pa Code, Section 262a.10.

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Person Interviewed

(Signature)

Date

2-11-03

Inspector

(Signature)

Date

2-10-03

Tripoli, Gerald

From: Andy Varga [avarga@pwr.com]
Sent: Wednesday, January 22, 2003 11:40
To: gtripoli@state.pa.us
Subject: Notice Response



Andrew B. Varga
 Director of Human Resources
 Powerex, Inc.
 200 East Hillis Street
 Youngwood, Pennsylvania 15697-1800
 724-925-4453

January 16, 2003

Mr. Gerald H. Tripoli
 Solid Waste Specialist
 Bureau of Waste Management
 PA Department of Environmental Protection
 Armbrust Professional Center
 RR #2, Box 603-C
 Greensburg, PA 15601-8739

Re: Vapor Pressure Calculations for Mixed Solvent Tank

Dear Mr. Tripoli:

Per your visit to Powerex yesterday, 1/15/03, here are the vapor pressure calculations for Powerex's 1000 gallon mixed solvent collection tank. Based on this information, Powerex is not subject to the requirements of 40 CFR Part 264, Subpart CC, due to being well under the noted limits.

- Tank Volume – 1000 gallons or 3.79 cubic meters.
- 40 CFR 265.1084 vapor pressure limit for tank designs < 75 cubic meters is 76.6kPA.

SOLVENT	% OF TOTAL TANK VOLUME	kPA VAPOR PRESSURE @ 25° C per MSDS	VOLUME OF kPA VAPOR PRESSURE
ACETONE	33%	30.6 kPA	10.09 kPA
2-PRPANOL	9%	5.87 kPA	0.52 kPA
METHANOL	7%	16.16 kPA	1.13 kPA
XYLENE	8%	1.07 kPA	.07 kPA
N-BUTYL ACTATE	18%	2.00 kPA	0.36 kPA
WNRD (Aliphatic Hydrocarbon)	25%	1.33 kPA	0.33 kPA
TOTALS	100%		12.50 kPA

If you have any questions, please contact me.



Sincerely,

1/22/2003

OCTOBER 8, 1978

Andrew B. Varga
Director of Human Resources

1/22/2003

Powerex

1-15-03

72-100

AIR EMISSIONS-SUBPART AA, BB and CC CHECKLIST

Subpart AA

Background: If a facility (TSD or LQG) manages hazardous wastes greater than 10 ppmw of organics in a process vent used in distillation, fractionation, solvent extraction, thin-film evaporation, air or steam stripping, Subpart AA may apply. Subpart AA would not apply in a bona-fide closed loop scenario at LQGs and TSDs. To comply, the facility would need to determine if the process vent(s) releases greater than 3.0 lbs/hr and 3.1 tons/year of organic air emissions to the atmosphere.. If it does not release that much then the facility is in compliance with Subpart AA. If its emissions are greater, then a control device is necessary to bring the facility into compliance. The control device may be a condenser, flare, carbon absorber, etc... that brings the equipment's emission rate below the 3.0 lbs/hr and 3.1 tons/year, or reduces the organic emissions by 95 %.

Objective: The Inspector should try to determine if Subpart AA applies at a particular facility and, if applicable, evaluate the facility's efforts to achieve compliance. Has the facility calculated or measured the organic emissions from all vents and compared that with the emissions limit?

1.(a) Is this facility a Large Quantity Generator ☒ Interim Status TSD ___ or Permitted TSD ___ **If NO, do not continue with the RCRA Air Emissions checklists.**

2.(a) Does the facility have any hazardous waste management unit using the following processes: distillation, fractionation, thin-film evaporation, solvent extraction, air stripping and steam stripping? ___ YES ☒ NO. **If NO, then proceed to the Subpart BB checklist.**

If YES, list each process vent that is associated to one of the processes.

(b) Are any of these processes exempt under the closed loop recycle exemption?

YES NO

If YES, please explain

(c) Does the hazardous waste contain greater than 10 ppmw organics? YES
NO.

(d) For those process vents with a yes answer to 2(c) describe the waste(s), unit(s) and processes.

(e) Identify those process vents with a no answer to 2 (c), and describe the information/ documentation used to make the determination (collect this information and submit to EPA).

3(a) Is the total hourly emission rate of the affected process vents greater than 3 lb/hr? YES NO

and

(b) Is the facility-wide yearly emission rate greater than 3.1 tons/yr? _____ YES
_____ NO

(c) If the answer to 3(a) or 3(b) is no, describe the calculations done by the company to support this determination (Provide copies of the calculations and associated information and submit it to EPA).

4.(a) If the answer to 3.(a) or (b) is Yes, did the facility install control devices to reduce the emissions? _____ YES _____ NO (**ALL TSDS MUST HAVE THE CONTROL DEVICES IN PLACE**).

Explain _____

(b) Do the calculations/analysis seem reasonable? _____ YES _____ NO

(Are they current? Are facility operating hours (e.g., 8 or 24 hours/day) correct? Have worst case scenarios been considered?)

If NO, explain _____

- 5.(a) Are control devices inspected and/or monitored at least once each operating day to ensure proper operation? ☐ YES ☐ NO
- (b) Is there any indication of a problem with the operation of the control devices? ☐ YES ☐ NO
- (c) In case of problems, were corrective measures implemented immediately? ☐ YES ☐ NO

IF THE FACILITY IS SUBJECT TO THE SUBPART AA RULE AND IS USING A CONTROL DEVICE, COLLECT THE DESIGN DATA AND MONITORING DATA AND FORWARD TO THE EPA OFFICE FOR REVIEW.

NA

Subpart BB

Background: If a facility (TSD or LQG) has equipment (any valve, pump, compressor, pressure relief device, sampling connection system, flange, open-ended valve or line) that contacts hazardous wastes greater than 10 percent organics, that facility is subject to the inspection and monitoring requirements of Subpart BB. If the equipment used to transport hazardous waste with greater than 10 percent organics is used for less than 300 hours per year, then the facility is excluded from the requirements of 264/265 § 1052 through 264/265 § 1060 of this subpart if the equipment is identified as required in 264/265 § 1064(g)(6).

- Objective:** The Inspector should try to determine if Subpart BB applies at a particular facility and, if applicable, evaluate the facility's Leak Detection and Repair (LDAR) program. Does it cover all the effected equipment, what is its frequency (monthly, quarterly) and are there records of timely (<15 days) equipment repair when leaks are detected. The importance of compliance with Subpart BB is a function of the amount and volatility of a facility's waste.

6. Does the facility have any valves, flanges, or pumps that contain or contact hazardous wastes greater than 10 percent organics? ☐ YES ☒ NO

7. Does the facility have any compressors, pressure relief devices, sampling connection systems, flanged pipe open-ended valve or line that contain or contact hazardous wastes greater than 10 percent organics? YES
 NO

8. Is the facility claiming the < 300 hours exemption YES ✓ NO

 9. If any of the answers to Questions 6, 7 & 8 is yes, does the facility have a list of each piece of equipment that is subject to Subpart BB. (Note: facility should have a list in their operating record, ask for copy).

☐ 10. Has this equipment been marked as required by the Subpart BB Regulations? YES NO

11. If the answer to questions 6 or 7 is no, does the facility have information/documentation to support its determination (provide a copy of this documentation to EPA).

12. Has the facility implemented a LDAR program? YES NO

Describe the program:

FOR PUMPS AND VALVES IN LIGHT LIQUID OR GAS/VAPOR SERVICE

LIGHT LIQUID SERVICE: For a hazardous waste to be in light liquid service, the vapor pressure of one or more of the organic constituents in the material must be greater than 0.3 Kilopascals at 20 degrees C and the total concentration of pure

organic constituents having a vapor pressure greater than 0.3 kilopascals at 20 degrees Centigrade is equal to or greater than 20 percent by weight. *N/A*

____ 13. Is each shaft driven pump in light liquid monitored monthly to detect leaks? _____ YES _____ NO

____ 14. Is each shaft driven pump in light liquid service checked by visual inspection each calendar week for indications of liquids dripping from the pump seal? _____ YES _____ NO

____ 15. Does the facility have any dual mechanical seal pumps that includes a barrier fluid system? _____ YES _____ NO

____ (i) Is the dual mechanical seal system operated such that:

(a) The pressure of the barrier fluid is always greater than the pump stuffing box pressure? _____ YES _____ NO

(b) Is the system equipped with a barrier fluid degassing reservoir that is connected by a close-vent system to a control device which complies with the requirements of 265 § 1060? _____
____ YES _____ NO

OR

(c) Is the pump equipped with a system that purges the barrier fluid into the hazardous waste stream with no detectable emissions?
____ YES _____ NO

(ii) Is the barrier fluid a hazardous waste with organic concentrations of 10 percent or more? _____ YES _____ NO

(iii) Is the barrier fluid system equipped with a sensor that will detect a failure of the seal system, the barrier fluid or both? _____ YES _____ NO

(iv) Is each pump checked by visual inspection for leaks on a weekly basis? _____ YES _____ NO

(v) Is each sensor checked daily or equipped with an audible alarm that is checked monthly to ensure that it is functioning? ____ YES ____ NO

(vi) If a leak is detected, is the system repaired on the 5/15 requirement? ____ YES ____ NO

16. Does the facility have any pump operating at NDE? ____ YES ____ NO
If YES

(a) Is there any externally actuated shaft penetrating the pump? ____ YES ____ NO

☐ (b) Was the pump tested for compliance with NDE? ____ YES ____ NO

17. Does the facility have any pumps that is equipped with a closed vent system capable of capturing and transporting any leakage from the seal/seals to a control device? ____ YES ____ NO (these are exempt from 264/265 s 1052(a) through (e) requirements)

____ 18. Is each valve in light liquid service or gas/vapor service monitored monthly/quarterly for leaks? ____ YES ____ NO

____ 19. Is any of the valves in light liquid service being monitored using the alternative methods specified in the regulations? ____ YES ____ NO

EQUIPMENT IN HEAVY LIQUID SERVICE

☐ 20. Are pumps, valves in heavy liquid service, pressure relief devices in light liquid or heavy liquid service and flanges and other connectors in light or heavy liquid service monitored for leaks by visual, olfactory, or any other detection method? ____ YES ____ NO

NA

SUBPART CC OVERVIEW

The Subpart CC regulations apply to Large Quantity Generators and Treatment, Storage and/Disposal Facilities that manage Hazardous Waste of Volatile Organic Concentration of 500ppmw or more on an average annual basis in Tanks and Containers.

For Tank Storage, there are two levels that a facility may use to manage their waste. Tank Level 1 requires a fixed roof tank which uses a maximum organic vapor pressure to comply with Subpart CC. Tank Level 2 designs can be one of five options. These are: (1)an Internal Floating Roof (2)an External Floating Roof (3) a tank with a Fixed Roof vented through a closed vent system to a control device (4) a Pressure Tank (5) a tank located inside an enclosure that is vented through a closed vent system to an enclosed combustion device.

Most of the facilities will comply with Tank Level 1 which is the easiest to follow. The other option that will be seen a lot would be Tank level 2 Option 3. The other options will be limited to a small number of facilities and should be referred to EPA for inspection. As a result, the emphasis of this checklist has been these two options.

For Container Storage, most of the facilities will store their waste in DOT approved containers. RCRA regulations already cover such storage and as a result, most facilities will be in compliance with the container storage regulations of the Subpart CC regulations.

The checklist does not deal with Surface Impoundments because there are only a few active ones remaining in the Region. These should be referred to EPA for inspection.

RCRA SUBPART CC CHECKLIST FOR AIR EMISSIONS AT LOGS AND TSDS

1. (a)Is this facility a TSD or a Large Quantity Generator (LQG)? ✓ YES
_____ NO

If the answer is no, **STOP**, Air Emissions-Subpart CC regulations do not apply.

2. (a) Are there any units at the facility subject to the CC Rule? ☒ YES
☐ NO

(b) If the answer is no, what is the reason? Ref. 40 CFR 265 § 1080(b) (264 § 1080(b) exceptions or 265 § 1083(c) (264 § 1082(c)) exemptions, or the general exclusions in 265.1(g) / (264.1(g)), as applicable.

40 CFR 1080(b) exemptions

None

- (1) Unit did not receive HW after 12/6/96 _____
(2) Using containers of less than 26 gallons capacity _____
(3) Unit undergoing closure _____
(4) Units used in an on-site RCRA or CERCLA clean-up _____
(5) Mixed Radioactive and hazardous waste _____
(6) Units with CAA, NESHAPS or NSPS controls _____
(7) Tanks with process vents (Subject to Subpart AA) _____

40 CFR 265.1083(c) exemptions:

- (8) Waste stream less than 500 ppmw average VOC _____
If so, was waste determination done per 265 § 1084? ☐ YES ☐ NO
(9) All waste placed in unit meets 268 § 40 (LDR) limits _____
(10) Tank is used for bulk feed to incinerator and requirements of 265 § 1083(5)(i)-(iii) are met _____

40 CFR 265.1 general exclusions/exemptions:

- (11) Hazardous waste recycling unit exemption _____
(12) Satellite accumulation area _____
(13) Totally enclosed treatment facility exemption _____
(14) Elementary neutralization unit (corrosive) _____
(15) Waste water treatment in tanks exemption _____
(16) Emergency or spill management exemption _____
(17) Biological treatment with 95 % efficiency _____

Except If exemption is based on (8) above, then **STOP**, subpart CC does not apply.

3. Is the average volatile organic concentration of each waste management unit more than 500 ppmw determined on an average annual basis at point of waste origination? ☒ YES ☐ NO

If yes, does the facility have a list each unit and the concentration in its operating record? If no, indicate if the determination for each unit is in the facility operating record? ☐ YES ☒ NO

NOTE : IF FACILITY CLAIMS THAT ITS WASTE IS BELOW 500PPM, THEN THE WASTE DETERMINATION DOCUMENTATION SHOULD BE IN THE OPERATING RECORD. INSPECTOR SHOULD REVIEW THIS DOCUMENTATION AND SUBMIT IT TO EPA

NA

FOR EACH UNIT, FOR WHICH A DETERMINATION HAS BEEN MADE THAT THE HAZARDOUS WASTE CONTAINS LESS THAN 500 PPM OF VOCs, ANSWER THE FOLLOWING QUESTIONS.

4. How was waste determination done? Using Knowledge or Sampling? _____ Ref 40 CFR 265 § 1084 (264 § 1083)

(a) If Knowledge was used, is there any documentation on file? ☐ YES ☐ NO

(b) Is it adequate? ☐ Yes ☐ No

(c) If sampling was used, does the facility have a written sampling plan? ☐ YES ☐ NO

(d)(i) If facility used sampling, was the sampling done by an EPA approved method? ☐ YES ☐ NO. Which Method? _____

(e) Has the waste stream changed since the initial waste determination was done which would cause the character of the waste to change or to exceed the threshold levels for applicability of Subpart CC? YES NO

(f) If so, was a new waste determination done? Yes No
If yes, repeat 4(a)-(e)

TANKS SUBJECT TO SUBPART CC

5. (a) Is HW having an average VO concentration of more than 500 ppmw placed in a tank with either level 1 or level 2 controls? ✓ YES NO (40 CFR 265.1085(b)(1))

Please note: The fixed roof and its closure devices shall be visually inspected by the owner/operator to check for defects that could result in air pollutant emissions. Defects include, but are not limited to, visible cracks, holes, or gaps in the roof sections or between the the roof and the tank walls; broken, cracked or otherwise damaged seals or gaskets on closure devices; and broken or missing hatches, access covers, caps, or other closure devices. An initial inspection should be done before any waste is stored in the tank and at least once annually thereafter.

6. Were the tanks inspected for leaks before waste was placed into the tank?
 Yes ✓ No. If yes, when was it done?

7. During the tank storage of hazardous waste, was an annual inspection done on the tanks described in Question 6? Yes
 ✓ No. If yes, when was it done? 5-6 yrs ago

Indicate options/level for each tank

 Tank level 1

For tanks with level 1 control:

Tank must meet 3 conditions for level 1 control:

- (1) Waste maximum organic vapor pressure less than cutoff for tank design capacity
- (2) No heating to or above temperatures at which vapor pressure is determined
- (3) No waste stabilization in tank

Vapor pressure is determined by knowledge or by measurement.

Compliance *Effective on 12-6-96, (265.1082)*

Status: *1) The mixed solvent tanks lack a closure device on an open vent pipe. 265.1085(c)*
2) While the mixed solvent waste stream is presumed to exceed 500 ppm of VOC, you should provide an analysis to identify the concentration as per 265.1084(a).
3) The tank and its closure devices shall be visually inspected immediately and annually thereafter. An inspection record shall be retained. The closure device shall be designed to operate with no detectable organic emissions when the device is secured in the closed position. 265.1085(c)(3)&(4) & (c)

NOTE: INSPECTOR SHOULD CHECK FOR VAPOR PRESSURE DETERMINATIONS, COLLECT INFORMATION AND BRING IT BACK TO OFFICE.

NA

FOR TANKS WITH LEVEL 2/OPTION 3 CONTROLS

OPTION 3- FIXED ROOF TANK VENTING THROUGH A CLOSED VENT SYSTEM, TO A CONTROL DEVICE THAT WOULD DESTROY OR REDUCE AT LEAST 95% OF VAPORS.

- (i) Is the fixed roof forming a continuous barrier over the entire surface area of the liquid in the tank? ☐ YES ☐ NO
- (ii) Are emissions vented to a control device? ☐ YES ☐ NO
- (iii) Are all openings in the roof not venting to the control device fixed with a closure device? ☐ YES ☒ NO

Max. O.V. vapor pressure of 12.50 kPA for tank sol calculation submitted & attached.

(iv) If the vapor pressure underneath the fixed roof cover is less than atmospheric pressure when control device is working, and the closure device is closed, are there any visible cracks, holes, gaps, or other open spaces between cover opening and closure device?

(v) If the vapor pressure below the fixed roof cover is equal to or greater than atmospheric pressure when the control device is working, are the cover and closure device designed to operate at NDE.

(vi) Are the cover and closure devices closed at all times and the vapor headspace vented to a control device except when O/O is

performing inspections

performing maintenance or other normal operations

accessing the tank

removing accumulated sludge and other residues from the bottom of the tank.

NOTE: INSPECTOR SHOULD COLLECT MONITORING DATA FROM THE CONTROL DEVICE AND THE DESIGN DATA AND BRING IT BACK TO THE OFFICE FOR REVIEW. ALL OTHER OPTIONS, REFER TO EPA

CONTAINERS:

LIGHT LIQUID SERVICE: For a hazardous waste to be in light liquid service, the vapor pressure of one or more of the organic constituents in the material must be greater than 0.3 Kilopascals at 20 degrees C and the total concentration of pure organic constituents having a vapor pressure greater than 0.3 kilopascals at 20 degrees Centigrade is equal to or greater than 20 percent by weight.

LEVEL ONE:

C There should be no waste stabilization.

- C Containers must be > 0.1 cubic meters (26.4 gal) and \leq to 122 gallons. If the organic waste is not in light liquid service, it can be above 122 gallons.
- C **OPTION 1**-Meet DOT standards.
- C **OPTION 2**-Use a cover and closure device on the container and ensure that there are no visible gaps in the interior of the container or holes in the covers.
- C **OPTION 3**-Use vapor suppressing barrier on or above the hazardous waste in the container.

LEVEL TWO:

- C There should be no waste stabilization.
- C Containers are larger than 0.46 cubic meters (122 gal) and are in light liquid service.
- C **OPTION 1**-The container must meet DOT specifications.
- C **OPTION 2**-Operates with no detectable emissions from the container under Method 21.
- C **OPTION 3**-Demonstrated to be vapor tight within the last twelve months using Method 27.

LEVEL THREE

- C Container must be used for waste stabilization.
- C Vent vapors from containers and remove or destroy them in a control device.

- ☐ Put container in a "Procedure T Enclosure" and, vent vapors, and destroy them in a control device.

8. What level of control is your facility using to comply with the Subpart CC regulations?

Level One ☒ Level Two _____ Level Three _____

Is the facility in compliance? _____ YES ☒ NO

☐ Provide the basis for your determination.

Drum storage is ok, see tank storage (cc) violation on page 12.

☐ *** NOTE: Most facilities will be in compliance if they are not conducting waste stabilization and if they store their waste in DOT approved 55 gallon drums.**



#1199122

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date 12-16-02

Time Start _____

Time Finish _____

HAZARDOUS WASTE INSPECTION REPORT

☒ GENERATOR☐ S Q GENERATORCompany name Powerex, Inc. I.D. Number PA0005000518Site Address 200 Hillis St. Youngwood Pa 15697County Westmoreland Municipality Westfield Twp Zip 15697Name of Inspector Gerald MurphyName & Title of Responsible Official Andy VargaPerson Interviewed Andy Varga Telephone (724) 925-4453Mailing Address (if different from above) SameAmount of Hazardous Waste Generated per Month: 12259 Pounds _____ Kgs

Site Characterization:

STORAGE: ☒ Container ☒ Tanks ☐ Containment Bldg. ☐ Drip Pad Other _____PBR: ☒ Neutralization/WWTP ☐ Reclaim Other _____GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad2. Universal Waste: ☐ Large Quantity Handler ☒ Small Quantity HandlerUniversal Waste Types fluorescent tubes → AER

3. Hazardous Waste Transporters:

Transporter Name Enviro of Ohio License Number PAMM 0548Transporter Name EAP Industries Inc. License Number AH 0660 ✓Transporter Name Pure Tech License Number AH 0647 ✓

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
FO06	solid & liquid TP electroplating sludge	Enviro - Canton OK
0002, 0001	lab packs	Chemtron - Avon OH
FO03, 0023, 2029		"
0001, FO03	mixed solvents	Pure Tech Systems
FO01	spent chlorinated solvent	Cleveland Solvents O
0001, FO03	mixed solvents	General Env. Mgt. (new name) Cleveland, O

U.S. Liquid AM 0651 Enviroserve JV. - AM-045

Metropolitan Env. Inc. - AM 0289 ✓

Dart AM-0219 Page _____ of _____

Chemical Solvents AH 006 ✓

Emerald Env. Services. - AH 0641 ✓

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name Powerex Inc ID Number PAD005006518 Date 12-16-02
1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
				Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
✓				Identification Number	262a.10	262.12	H002
✓				Authorized transporters only	262a.10	262.12(c)	H003
✓				Subsequent notification requirements met	262a.12(b)		H004
✓				Proper manifest used	262a.10	262.21	H005
✓			✓	Manifests filled out correctly and completely	262a.20		H006
✓			✓	Manifests signed and routed properly	262a.23(a)	262.23	H007
✓				Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
	✓			SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
	✓			SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
✓				Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
✓				Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
			✓	Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
✓				Specified records retained for three years	262a.10	262.40(c)	H014
				Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
			✓	Exception reporting procedures followed	262a.42	262.42	H016
✓				Spill reporting procedures followed	262a.10	262.34(d)	H017
✓				PPC plan developed and implemented	262a.10	262.34(a)	H018
	✓			Special requirements followed for international shipments	262a.10	262.50 262.60	H019
✓				Source reduction strategy prepared and available (LQG only)	262a.100		H020
✓				Excluded waste complies with exclusionary requirements	261a.4	261.4	H021

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS
FACILITY SPECIFICS

Site Name Powerex Inc ID Number PAD005000518 Date 12-16-02
1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				CONTAINERS (Subchapter I)			
/	/	/	/	Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
/	/	/	/	Containers of hazardous waste in good condition	265a.1	265.171	H026
/	/	/	/	Containers and stored waste compatible	265a.1	265.172	H027
/	/	/	/	Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
/	/	/	/	Containers managed to prevent leaks	265a.1	265.173(b)	H029
/	/	/	/	Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
/	/	/	/	Container storage areas inspected at least weekly	265a.1	265.174	H031
/	/	/	/	Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
/	/	/	/	Proper containment and collection systems in place	265a.179		H033
/	/	/	/	Air emission standards complied with (AA, BB, CC) <i>tanks</i>	265a.1	265.178	H034
/	/	/	/	Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
/	/	/	/	Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
/	/	/	/	Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS
FACILITY SPECIFICS

Site Name

Powerex

ID Number

PA 0005000518

Date

12-16-02

1 - No Violation Observed

2 - Not Applicable

3 - Not Determined

4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
				LQG TANKS (Subchapter J)			
/				Tanks labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H040
/				Written certification by registered professional engineer for proper tank (system) design and installation on file	262a.10	265.192(a)	H041
/				Secondary containment provided for tanks (systems) as required	265a.193	265.193	H042
/				Tanks (systems) managed to prevent rupture, leak, corrode or fail	265a.1	265.194	H043
/				Tanks labeled to accurately identify contents	265a.194		H044
/				Required inspections completed and documented in operating log	265a.195	265.195	H045
/				Release reported to Department within 24 hours, unless exempted	265a.1	265.196	H046
/				Special requirements for ignitable and reactive wastes followed	265a.1	265.198	H047
/				Special small quantity generator requirements	265a.1	265.201	H048
				SQG TANKS			
				Waste contents compatible with tank	265a.1	265.201(b)(2)	H051
				Uncovered tanks operated with 2 feet of freeboard or equivalent containment capacity	265a.1	265.201(b)(3)	H052
				If continuously fed, tank has method to stop inflow	265a.1	265.201(b)(4)	H053
				Daily tank inspection requirements complied with	265a.1	265.201(c)(1-3)	H054
				Weekly tank inspection requirements complied with	265a.1	265.201(c)(4,5)	H055
				All waste removed at closure	265a.1	265.201(d)	H056
				Special requirements for ignitable or reactive waste complied with	265a.1	265.201(e)(1)	H057
				Covered tank buffer zone requirements complied with	265a.1	265.201(e)(2)	H058
				Incompatible waste requirements met	265a.1	265.201(f)	H059

121000

PA0005000518

Hazardous Waste Inspection Report
Land Disposal Restriction Supplemental Checklist

1-No Violation Observed					2-Not Applicable					3-Not Determined					4-Non-Compliance				
Status				REQUIREMENT												Citation			
1	2	3	4													40 CFR Part 268			
				Generators															
/				Notification sent with shipments of wastes that do not meet treatment standards.												7(a)(1)			
/				Notification and certification sent with shipments of wastes meeting treatment standards.												7(a)(2)			
/				Dilution not used as a substitute for treatment.												3			
/				Records maintained of notifications, certifications, waste analysis, and documentation supporting use of knowledge for waste classification.												7(a)(5), (a)(6)			
				Storage Facilities															
	/			Facility verifies generators classification of waste in accordance with waste analysis plan.												25 Pa Code 265.13(c)			
○				Containers marked to identify contents and accumulation date.												50(a)(2)			
				Notification sent with shipments of wastes that do not meet treatment standards.												7(a)(1)			
				Notification and certification sent with shipments of wastes meeting treatment standards.												7(a)(2)			
				Facility maintains records of documents produced pursuant to LDR requirements.												7(a)(6)			
				Treatment Facilities, including PBR and RRR Facilities															
/				Dilution not used as a substitute for treatment.												3			
/				Facility tests wastes or treatment residues to determine compliance with applicable treatment standards in accordance with waste analysis plan.												7(b)			
/				Certification and/or notification sent with shipments of waste.												7(b)(4), (b)(5), (b)(6)			
				Land Disposal Facilities															
○				Facility tests wastes received to assure compliance with applicable treatment standards.												7(c)(2)			
				Facility land disposes of restricted waste only if it meets applicable treatment standard.												40			
				Facility retains copies of generator notifications and certifications.												7(c)(1)			



Bureau of Land Recycling and Waste Management

P.O. Box 8550

Harrisburg, PA 17105-8550

OFFICIAL PENNSYLVANIA MANIFEST FORM

2500-FM-LRWM0051 REV. 7/99

Form ap

OMB No

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. PAH 005 000 518	Manifest Document No. 02221	2. Page 1 of 1	Information within the bold red text is not required by Federal law but is required by State law.
3. Generator's Name and Mailing Address POWEREX, INC. 200 MILLIS STREET YOUNGWOOD, PENNSYLVANIA 15697 4. Generator's Phone (724) 825-4348				A. State Manifest Document Number PAG 312858	
5. Transporter 1 Company Name		6. US EPA ID Number		C. State Trans. ID PA-AH 0548	
7. Transporter 2 Company Name		8. US EPA ID Number		D. Transporter's Phone (800) 858-1111	
9. Designated Facility Name and Site Address ENVIRITE OF OHIO, INC. 2050 CENTRAL AVENUE, S.E. CANTON, OHIO 44707		10. US EPA ID Number OHD 980 568 892		E. State Trans. ID PA-AH	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HM a. <input checked="" type="checkbox"/> RQ, HAZARDOUS WASTE LIQUIDS, H.O.S. 9, RA3082, PG: III (FC06)				12. Containers No. Type 001 TT	13. Total Quantity 04925
14. Additional Descriptions for Materials Listed Above				15. Handling Codes for Wastes Listed Above a. c. b. d.	
15. Special Handling Instructions and Additional Information Acceptance: A)C2787 Egg Guide: a)171 24 Hr. Emergency Phone: 412-788-2600 Send Invoice & Completed Cert. of Disposal/Treatment to WMMC, INC. PO 02221					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method to me and that I can afford.					
Printed/Typed Name ANDREW VARGA		Signature <i>Andrew Varga</i>		MONTH DAY 12 1	
17. Transporter 1 Acknowledgment of Receipt of Materials Printed/Typed Name DYLAN K. H.		Signature <i>Dylan K. H.</i>		MONTH DAY 12 1	
18. Transporter 2 Acknowledgment of Receipt of Materials Printed/Typed Name		Signature		MONTH DAY	
19. Discrepancy Indication Space					
Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19. Printed/Typed Name Signature MONTH DAY					

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 12-16-02 Identification Number PA 0005000518

Company/Facility/Site Name Powerex, Inc.

Observations

Andy Vargu and I inspected the waste generating areas of the facility and reviewed the last two years of records. ~~Two~~ manifests of hazardous waste shipments had the generators copy but lacked the TSD signed copy at the generators record storage area. 1) A 2-22-01 shipment by EAP Industries to Pure Tech Systems of mixed solvents on manifest # PAX 9490250. 2) A 9-24-01 manifest # PAG 312490 contained mixed solvent shipped by U.S. Liquids to Pure Tech. and 3) A 5-29-02 manifest of mixed solvent by Enviroserve T.V. to General Environmental Management all lack the TSD signed copy to verify delivery. You are required to retain the original manifest copy until you receive the signed copy, which should be retained for at least three years. No manifest exception reports were completed for these three missing manifests. If the signed copy is not returned within 35 days the generator is required to call to locate the manifest & verify delivery. The generator

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) _____

Date _____

Inspector (signature) _____

Date 1-10-03

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 12-16-02 Identification Number PAD005000518Company/Facility/Site Name Powerex Inc.

is required to complete the exception report within 45 days of the shipment date. A 12-4-02 manifest # PAG 312858 was not properly completed in section 5 & 6 for transporter 1.

Since my last inspection on 6-15-01 the excavation for the industrial wastewater spill has been backfilled and the fencing has been replaced. The Act 2 & Notice of Intent to Remediate for the release of silver, nickel and fluoride to the ground, has not been completed as promised in 2002. The two previous hazardous waste violations have been corrected. The non-hazardous waste violation involving a cleanup to Act 2 standards has not been completed or resolved.

Since my last inspection the electroplating line has all been moved upstairs. The room has a secondary liner and the cyanide bearing and acid bearing equipment have separate secondary containment built into the tanks. The wastewater treatment permit by rule facility retains darts

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the persons interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed _____

Date _____

(Signature)

Inspector _____

(Signature)

Date 1-10-03

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection

12-16-02

Identification Number

PA-D005000518

Company/Facility/Site Name

Powerex Inc

records and appears to be adequately maintained. Containers of hazardous waste in the waste accumulation area were marked & dated and closed.

B) Violations

- 1) Two manifests dated 2-22-01 and 9-24-01 of mixed solvent (D001, F003) lacked the TSE signed copy in the generator's records. This is a violation of 40 CFR Section 262.40(a)(6) as incorporated by reference in 25 Pa Code Section 262a.10. You should secure the signed copy to verify delivery and retain for at least three years.
- 2) If a signed copy of the manifest is not retained within 35 days of the shipping date, the generator is required to contact the transporter or TSE to verify delivery. The generator also failed to complete an exception report to document the information pertaining to the missing manifest within 45 days of the shipping date. This is a violation of 40 CFR Section 262.42 as incorporated by reference in 25 Pa Code Section 262a.42.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the persons interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed

Date

(Signature)

Inspector

Date

(Signature)



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection

12-16-02

Identification Number

PAD005000548

Company/Facility/Site Name

Powerex, Inc.

Violations (cont)

- 2) (cont). you should complete an exception report with the attached copy of a signed manifest to verify delivery. and retain for at least 3 years
- 3) Manifest # PAG 312 858 transported by Enroute of this was improperly completed by the generator prior to shipment of the EOP sludge waste to Enroute of Canton. Section 5 and 6 for the transporter name and USEPA ID NO were not completed. This is a violation of 25 Pa Code, Section 262 a.20. You should properly complete all manifests prior to shipment.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the persons interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed

Manted

(Signature)

Date

1-10-03

Inspector

Gerald Nyro

(Signature)

Date

1-10-03



PCX 70995 TIN
Pennsylvania Department of Environmental Protection

Armbrust Professional Center
RR #2, Box 603-C
Greensburg, PA 15601-8739

April 20, 2001

Greensburg District Office

724-925-5400

NOTICE OF VIOLATION

CERTIFIED MAIL NO. 7099 3400 0015 5241 8824

Powerex, Inc.
200 Hillis Street
Youngwood, PA 15697

Attention: Andrew Varga

Re: Powerex, Inc.
EPA ID # PAD005000518
Hempfield Township
Westmoreland County

Dear Mr. Varga:

As a result of a March 28, 2001 inspection at the referenced facility, the Department of Environmental Protection (DEP) has determined that you are in violation of the Solid Waste Management Act, Act of July 7, 1980, P.L. 380, No. 97, 35 P.S. Sections 6018.101 et seq., and the Hazardous Waste Management Rules and Regulations found at 40 C.F.R. Parts 260 to 270 incorporated by reference at 25 Pa. Code Chapters 260a to 270a.

1. The tank system used to hold F006 hazardous wastewater treatment plant sludge has not been certified in accordance with 40 CFR Section 265.192(a) as incorporated by reference in 25 Pa. Code, Sections 262a.10, 265a.191 and 265a.193. As a large quantity generator of hazardous waste conducting treatment of electroplating wastewater under a permit by rule, you were required to have the integrity of this F006 tank system assessed by January 17, 1994 and certified by a registered professional engineer by January 16, 1996. This has not been completed to date. This should be completed within 30 days of receipt of this letter in accordance with those regulations.
2. 25 Pa. Code Section 270a.60(b)(1), and (2) incorporates by reference the requirements of 40 CFR Section 270.60 related to permit by rule. This Pa. Code states that the operator of a captive wastewater treatment unit is deemed to have a permit by rule if it, among other requirements, meets the applicable requirements of 40 CFR Part 264, Subparts A through D, I, J, and DD, and Chapter 264a, Subchapters A, B, D, I, J, and DD. 40 CFR Section 264.14 requires site security such as a fence to completely surround the active portion of the facility. The fencing has been removed in the rear of the plant since July of 1999 due to a leak at the equalization tank.



3. A non-hazardous contaminated soil remediation project outside of the equalization tank in the rear of the wastewater treatment plant, has not been completed yet. The cleanup should be completed to prescribed levels or to Act 2 standards. Disposal of solid wastes without a permit is a violation of Act 97 of the Solid Waste Management Act, Sections 201(a), 501, and 610(1).
4. PA Manifests PAEX9489056 and PAEX9489071 were improperly completed. The former (056) contained one 55-gallon drum of "RQ Waste Poisonous Liquids, N.O.S. (contains trichloroethylene)", with the waste number "D040, F001" that was improperly characterized as "NOT A REGULATED MATERIAL" with a waste number "n/a". The later manifest (071) was changed to denote the addition of another drum of D040, F001 and the former drum (056) had one drum deleted. Each manifest should be properly completed by the generator prior to delivery to the transporter (Envirite) or to the designated facility (Chemtron Corp. of Avon, OH). This is a violation of 25 Pa. Code Section 262a.20.

You are notified of both the existence of the violations as well as the need to provide prompt correction. Failure to correct the violations may result in legal proceedings under the Solid Waste Management Act. Under the Act, each day of the violation is considered a distinct and separate offense and will be handled accordingly.

Within 30 days of receipt of this notice, please submit a proposed plan and schedule to DEP for correction of the violations.

This Notice of Violation is neither an order nor any other final action of the Department of Environmental Protection. It neither imposes nor waives any enforcement action available to the Department under any of its statutes. If the Department determines that an enforcement action is appropriate, you will be notified of the action.

If you have any questions about this letter, please contact me at 724-925-5404.

Sincerely,



Gerald H. Tripoli
Solid Waste Specialist
Bureau of Waste Management

bcc: EPA
Region
Chron
Leonard Tritt
Westmoreland County File (2) ✓



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date 3-28-01
Time Start 2:00
Time Finish 4:00 PM

HAZARDOUS WASTE INSPECTION REPORT



GENERATOR



S Q GENERATOR

Company name Powerex Inc. I.D. Number PAD005000518
Site Address 200 Hillis St. Youngwood, Pa
County Westmoreland Municipality Hempfield Twp Zip 15697
Name of Inspector Gerald Tripoli
Name & Title of Responsible Official Andy Varga
Person Interviewed Andy Varga Telephone (724) 925-4453
Mailing Address (if different from above) Same
Amount of Hazardous Waste Generated per Month: 12259 Pounds _____ Kgs

1. Site Characterization:

STORAGE: ☒ Container ☒ Tanks ☐ Containment Bldg. ☐ Drip Pad Other _____

PBR: ☒ Neutralization/WWTP ☐ Reclaim Other _____

GENERATOR TREATMENT ☐ Containers ☒ Tanks ☐ Containment Bldg. ☐ Drip Pad

2. Universal Waste: ☐ Large Quantity Handler ☒ Small Quantity Handler

Universal Waste Types fluorescent tubes → A.E.R.

3. Hazardous Waste Transporters:

Transporter Name Enviroite of OHIO License Number PAAH 0548

Transporter Name _____ License Number _____

Transporter Name _____ License Number _____

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
F006	solid wwt electroplating sludge	Enviroite - Canton OH
D009, D002	lab packs	Chemtron Avon OH
D001/F003	solvent	Pure Tech Systems
F001	spent chl. solvents	Cleveland Solvents

003
1023,
27,29
F001

clear one

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name Powerex Inc ID Number PA0005000518 Date 3-28-01

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
		✓		Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
✓				Identification Number	262a.10	262.12	H002
✓				Authorized transporters only	262a.10	262.12(c)	H003
✓				Subsequent notification requirements met	262a.12(b)		H004
✓				Proper manifest used	262a.10	262.21	H005
		✓		Manifests filled out correctly and completely	262a.20		H006
✓				Manifests signed and routed properly	262a.23(a)	262.23	H007
✓				Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
	✓			SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
	✓			SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
✓				Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
✓				Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
✓				Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
✓				Specified records retained for three years	262a.10	262.40(c)	H014
	✓			Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
	✓			Exception reporting procedures followed	262a.42	262.42	H016
✓				Spill reporting procedures followed	262a.10	262.34(d)	H017
✓				PPC plan developed and implemented	262a.10	262.34(a)	H018
	✓			Special requirements followed for international shipments	262a.10	262.50 262.60	H019
	✓			Source reduction strategy prepared and available (LQG only)	262a.100		H020
✓				Excluded waste complies with exclusionary requirements	261a.4	261.4	H021

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name Powerex Inc ID Number PA0005000518 Date 3-28-01

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
				LQG TANKS (Subchapter J)			
✓				Tanks labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H040
		✓		Written certification by registered professional engineer for proper tank (system) design and installation on file	262a.10	265.192(a)	H041
✓				Secondary containment provided for tanks (systems) as required	265a.193	265.193	H042
✓				Tanks (systems) managed to prevent rupture, leak, corrode or fail	265a.1	265.194	H043
✓				Tanks labeled to accurately identify contents	265a.194		H044
✓				Required inspections completed and documented in operating log	265a.195	265.195	H045
✓				Release reported to Department within 24 hours, unless exempted	265a.1	265.196	H046
✓				Special requirements for ignitable and reactive wastes followed	265a.1	265.198	H047
✓				Special small quantity generator requirements	265a.1	265.201	H048
				SQG TANKS			
✓				Waste contents compatible with tank	265a.1	265.201(b)(2)	H051
✓				Uncovered tanks operated with 2 feet of freeboard or equivalent containment capacity	265a.1	265.201(b)(3)	H052
✓				If continuously fed, tank has method to stop inflow	265a.1	265.201(b)(4)	H053
✓				Daily tank inspection requirements complied with	265a.1	265.201(c)(1-3)	H054
✓				Weekly tank inspection requirements complied with	265a.1	265.201(c)(4,5)	H055
✓				All waste removed at closure	265a.1	265.201(d)	H056
✓				Special requirements for ignitable or reactive waste complied with	265a.1	265.201(e)(1)	H057
✓				Covered tank buffer zone requirements complied with	265a.1	265.201(e)(2)	H058
✓				Incompatible waste requirements met	265a.1	265.201(f)	H059

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS
FACILITY SPECIFICS

Site Name Powerex Inc ID Number PA1005000518 Date 3-28-01
1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				CONTAINERS (Subchapter I)			
		✓		Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
✓				Containers of hazardous waste in good condition	265a.1	265.171	H026
✓				Containers and stored waste compatible	265a.1	265.172	H027
✓				Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
✓				Containers managed to prevent leaks	265a.1	265.173(b)	H029
✓				Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
✓				Container storage areas inspected at least weekly	265a.1	265.174	H031
✓				Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
✓				Proper containment and collection systems in place	265a.179		H033
✓				Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
✓				Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
✓				Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
✓				Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 3-28-01 Identification Number PAD005000518
Company/Facility/Site Name Powerex, Inc.

A) Observations

Secondary containment has been provided for 1 cubic yard sacks used to accumulate the F006 sludge after plate pressing. The rolloff box of F006 (15 yards) was removed by Enroute to their facility in Canton Ohio on 3-1-01. This would be the correction date for the previous violation involving secondary containment for the rolloff box. (265a.175 & 179.8 264.191 & 193. The F006 waste storage tank has not been certified yet as required by 264.191 and 193. The former equalization tank/line spill site cleanup has not been completed yet. I await confirmation that the spill has been cleaned up or that an Act 2 standard has been met. The fencing surrounding the industrial WWTP has not been replaced yet.

B) Violations remaining

1) The F006 waste storage tank has not been certified in accordance with 40 CFR Section 264.191 - 193 as incorporated by reference in 25 Pa Code 262a.10 by 1-16-96 or to date. This tank should be certified within 30 days of this inspection.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) Gerald Myron Date 4-10-01
Inspector (signature) Gerald Myron Date 4-10-01

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 3-28-01 Identification Number PADO05000528

Company/Facility/Site Name Powerex, Inc

Violations (cont)
2) As part of your hazardous waste treatment permit-by-rule provisions, you should maintain an artificial barrier to secure the active portion of wastewater treatment plant. You should replace all missing fencing to secure the facility adequately. This is a requirement of 40 CFR Section 264.14(b)(2) as incorporated by reference in 25 Pa Code, Section 264a.1

Non-Hazardous Violation remaining
3) The non-hazardous contaminated soil spill cleanup has not been completed yet. You should clean up all spilled waste to background or Act 2 standard. ~~and~~ This is a violation of Act 97, Section 610 (i).

Additional Observations:
Manifest records were reviewed for period of 7-31-00 thru present. One manifest error was caught at Chemtron. One drum marked "Not a Regulated Material" was transported by Envirote of Ohio on Pa manifest No. PAEX 9489056. The TSP is

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This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) Martel Date 4-10-01
Inspector (signature) David A. Nyman Date 4-10-01

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 3-28-01 Identification Number PAD005000518

Company/Facility/Site Name Powerex, Inc
(cont)

presently reviewing their records and will submit photocopies and their evaluation of container markings.

Chemtron requested a change in the container number and quantity and waste number. They identified that one 50 gal drum was a F001/DO40 trichloroethylene contain poisonous liquid with the approval code Q20001012A30. Cathy Seard, broker with WMMC, approved the change for to delete the one non hazardous drum and add one ^{hazardous} manifest No. PAEX 94890, which accompanied the other manifest on the truck.

New violation:

c) Manifest No. PAEX 9489056 was improperly completed by the generator. This manifest improperly characterized one drum of F001/DO40 as "Not a Regulated Material". The markings & labeling on this container have not been identified yet. This is a violation of 25 Pa Code Section 262a.20. Drums improperly labeled ~~would~~ ^{may} also be a violation of 40 CFR Sections 262.31 & 32 as incorporated by reference in 25 Pa Code Section 262a.10.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) [Signature]

Date 4-11-01

Inspector (signature) [Signature]

Date 4-10-01

UNIFORM HAZARDOUS
WASTE MANIFEST

1. Generator's US EPA ID No.

Manifest
Document No.2. Page 1
of 2Information within the blue border is not
required by Federal law but may be
required by State law.

3. Generator's Name and Mailing Address

POWEREX, INC.
200 HILLIS STREET
YOUNGWOOD, PENNSYLVANIA 15697

4. Generator's Phone

5. Transporter 1 Company Name

ENVIRITE OF OHIO, INC.

6. US EPA ID Number

OH D 9 8 0 5 6 8 9 9 2

7. Transporter 2 Company Name

8. US EPA ID Number

9. Designated Facility Name and Site Address

CHEMTRON CORP.
35850 SCHNEIDER COURT
AVON, OHIO 44011

10. US EPA ID Number

OH D 0 6 6 0 6 0 6 0 9

A. State Manifest Document Number

PA X 9489056

B. State Gen. ID

C. State Trans. ID

PA-AH 0548

D. Transporter's Phone (800) 858-9423

E. State Trans. ID

PA-AH

F. Transporter's Phone ()

G. State Facility's ID

H. Facility's Phone (440) 937-5950

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

12. Containers

No.

Type

13.
Total
Quantity14.
Unit
Wt/Vol15.
Waste No.

a. NOT A REGULATED MATERIAL

003

DM

0150

G

n/a

b. RQ, HAZARDOUS WASTE SOLID, N.O.S., 9,
NA3077, PG: III

002

DM

00010

P

D009

c. RQ, WASTE CORROSIVE LIQUIDS, N.O.S.
(CONTAINS SULFURIC ACID), 8, UN1830, PG: II

001

DF

00050

G

D002

d. RQ, WASTE CORROSIVE SOLID, N.O.S.

001

DM

00090

P

n/a

J. Additional Descriptions for Materials Listed Above

Lab Pack

Physical State

Lab Pack

Physical State

a. ☐☐c. ☐☐b. ☐☐d. ☐☐

K. Handling Codes for Wastes Listed Above

a. ☐c. ☐b. ☐d. ☐

15. Special Handling Instructions and Additional Information

Accept: a) Q20001012A31 b) Q20001012A29 c) Q20001005A
ERG a) n/a b) 171 c) 137 d) Q20001023A19

24 Hour Emergency Phone (412) 788-2600

Send Invoice & Completed Cert. of Disposal/Treatment to WMMC, INC.

P.O. 01256

16. GENERATOR'S CERTIFICATION:

I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are
classified, packed, marked and labeled and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically
practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health or
the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available
me and that I can afford.

Printed/Typed Name

A.B. VARGA

Signature

MONTH DAY YEAR

11 02 90

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

DOUG MCKENZIE

Signature

MONTH DAY YEAR

11 02 90

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

MONTH DAY YEAR

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.

Printed/Typed Name

Signature

MONTH DAY YEAR

In case of an emergency or spill immediately call the National Response Center (800) 424-8802 and the PA Dept (717) 787-4343

GENERATOR

TRANSPORTER

FACILITY


 PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION
 Bureau of Land Recycling and Waste Management

 P.O. Box 8550
 Harrisburg, PA 17105-8550

OFFICIAL PENNSYLVANIA MANIFEST FORM

 Form approved.
 OMB No. 2050-00
 Expires 9-30-99

EP-LRWMS1 REV. 3/97

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.

Manifest Document No.

2. Page 1 of 2

Information within the blue border is not required by Federal law but may be required by State law.

3. Generator's Name and Mailing Address

 POWEREX, INC.
 200 HILLIS STREET
 YOUNGWOOD, PENNSYLVANIA 15697

4. Generator's Phone

5. Transporter 1 Company Name

ENVIRITE OF OHIO, INC.

6. US EPA ID Number

OH D 9 8 0 5 6 8 9 9 2

7. Transporter 2 Company Name

8. US EPA ID Number

9. Designated Facility Name and Site Address

 CHEMTRON CORP.
 35850 SCHNEIDER COURT
 AVON, OHIO 44011

10. US EPA ID Number

OH D 0 6 6 0 6 0 6 0 9

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

NOT A REGULATED MATERIAL

12. Containers

No. Type

002 DM

003

13. Total Quantity

0100

0150

14. Unit Wt/Vol

G

G

15. Waste No.

n/a

n/a

 b. RQ, HAZARDOUS WASTE SOLID, N.O.S., 9,
 NA3077, PG: III

002 DM

00010

P

D009

 c. RQ, WASTE CORROSIVE LIQUIDS, N.O.S.
 (CONTAINS SULFURIC ACID), 8, UN1830, PG: II

001

DF DM

00025

00050

G

D002

d. RQ, WASTE CORROSIVE SOLID, N.O.S.

001

DM

00090

P

n/a

J. Additional Descriptions for Materials Listed Above

Lab Pack

Physical State

Lab Pack

Physical State

a. ☐☐c. ☐☐b. ☐☐d. ☐☐

K. Handling Codes for Wastes Listed Above

a.

c.

b.

d.

15. Special Handling Instructions and Additional Information

 Accept: a) Q20001012A31 b) Q20001012A29 c) Q20001005
 ERG a) n/a b) 171 c) 137 d) Q20001023A19

24 Hour Emergency Phone (412)788-2600

 Send Invoice & Completed Cert. of Disposal/Treatment to WMMC, INC.
 P.O. 01256

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Printed/Typed Name

AB VARGA

Signature

MONTH DAY YE

11/02/10

17. Transporter 1 Acknowledgment of Receipt of Materials

Printed/Typed Name

DOUG McKENIE

Signature

MONTH DAY YE

11/02/10

18. Transporter 2 Acknowledgment of Receipt of Materials

Printed/Typed Name

Signature

MONTH DAY YE

19. Discrepancy Indication Space

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.

Printed/Typed Name

Signature

MONTH DAY YE

In case of an emergency or spill immediately call the National Response Center (800) 424-8802 and the PA DEP (717) 787-4343

GENERATOR

TRANSPORTER

FACILITY

Facsimile

TRANSMITTAL



WMMC, Incorporated
602 Parkway View Drive
Pittsburgh, Pennsylvania 15205
(412)788-2600
FAX (412)788-2608

Please file

to: ANDY VARGA, POWEREX, INC.
fax #: 724-925-4449
re: MANIFESTS DATED 10/14/00
date: 10/25/00
pages: 3 pages total, including this cover sheet
from: CATHY SICARD

Message: I AM ATTACHING CORRECTED MANIFESTS TO YOU, AFTER
REVIEWING THE INVENTORY AND THE DRUM SHIPMENT FROM YESTERDAY.
ONE OF THE DRUMS LABELED AS "NOT A REGULATED MATERIAL" SHOULD
HAVE BEEN SENT HAS A HAZARDOUS DRUM. THE TRANSPORTER AND THE
DISPOSAL FACILITY HAVE ALREADY BEEN NOTIFIED AND THE CHANGE
WILL BE MADE AND CORRECTED ON THE DOCK TODAY AT 2:00 PM.
PLEASE CHANGE YOUR MANIFEST ACCORDINGLY BEFORE SUBMITTING
THEM TO THE STATE.
PLEASE CALL IF YOU HAVE ANY QUESTIONS REGARDING THIS ISSUE.

ALL COPIES MUST BE LEGIBLE. PLEASE PRINT OR TYPE. SEE INSTRUCTIONS ON BACK.



PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION
Bureau of Land Recycling and Waste Management
P.O. Box 8550
Harrisburg, PA 17105-8550

Form approved.
OMB No. 2050-0033
Expires 9-30-99

EP-LRWMS1 REV. 3/87

OFFICIAL PENNSYLVANIA MANIFEST FORM

UNIFORM HAZARDOUS
WASTE MANIFEST

1. Generator's US EPA ID No.

Manifest
Document No.

2. Page 1
of 1

Information within the blue border is not
required by Federal law but may be
required by State law.

P A D 005 000 518

0 1 2 5 6

3. Generator's Name and Mailing Address

POWEREX, INC.
200 HILLIS STREET
YOUNGWOOD, PA 15697

4. Generator's Phone (724) 925-4453

A. State Manifest Document Number

PA X 9489071

B. State Gen. ID

5. Transporter 1 Company Name

ENVIRITE OF OHIO, INC.

6. US EPA ID Number

0 H D 9 8 0 5 6 8 9 9 2

C. State Trans. ID

PA-AH 0548

7. Transporter 2 Company Name

8. US EPA ID Number

D. Transporter's Phone (800) 858-9423

E. State Trans. ID

PA-AH

9. Designated Facility Name and Site Address

CHEMTRON CORPORATION
35850 SCHNEIDER COURT
AVON, OHIO 44011

10. US EPA ID Number

0 H D 0 6 6 0 6 0 6 0 9

F. Transporter's Phone ()

G. State Facility's ID

H. Facility's Phone (440) 937-5950

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

12. Containers

13. Total
Quantity

14. Unit
Wt/Vol

15. Waste No.

a. RQ, WASTE CORROSIVE LIQUIDS, TOXIC, N.O.S.
(CONTAINS ALKYBENZENE, SULFONIC ACID),
8, UN2922, PG: II (D002)

001

DM

00050 G

D002
D023
D027
D039

b. RQ, WASTE POISONOUS LIQUIDS, N.O.S.
(CONTAINS TRICHLOROETHYLENE), 6.1, UN2810,
PG: III

002

DM

00095 G

D040
F001

c. RQ, WASTE PAINT RELATED MATERIAL, FLAMMABLE,
N.O.S., 3, UN1263, PG: II (D001)

001

DM

00050 G

D001

d. HAZARDOUS WASTE SOLID, N.O.S.
9, NA3077, PG: III

001

DM

00010 P

D006

J. Additional Descriptions for Materials Listed Above

Lab Pack

Physical State

Lab Pack

Physical State

a. ☐ ☐ L

c. ☐ ☐ L

b. ☐ ☐ L

d. ☐ ☐ S

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

ERG # a)154 b)153
c)127 d)171

Accept: a)Q20001013AT4 b)Q20001012A30
c)Q20000816A17 d)Q19980106A06

24 Hour Emergency Phone Number (412)788-2600

Send Invoice & Completed Cert. of Disposal/Treatment to WMMC, INC.

PO 01256

16. GENERATOR'S CERTIFICATION:

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If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economic
practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health
the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available
to me and that I can afford.

Printed/Typed Name

AB VARGA

Signature

[Signature]

MONTH DAY YE

1/0 6/24/10

17. Transporter 1 Acknowledgment of Receipt of Materials

Printed/Typed Name

DOUG MCKENIE

Signature

[Signature]

MONTH DAY YE

1/0 6/24/10

18. Transporter 2 Acknowledgment of Receipt of Materials

Printed/Typed Name

Signature

MONTH DAY YE

19. Discrepancy Indication Space

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name

Signature

MONTH DAY YE

GENERATOR

FACILITY



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date 6-15-01

Time Start _____

Time Finish _____

HAZARDOUS WASTE INSPECTION REPORT

☒ GENERATOR☐ S Q GENERATORCompany name Powerex, Inc I.D. Number PADO05000518Site Address 200 Hillis St, Youngwood Pa 15697County Westmoreland Municipality Hempfield Twp Zip 15697Name of Inspector Gerald AngeliName & Title of Responsible Official Andy VargaPerson Interviewed Andy Varga Telephone (724) 925-4453Mailing Address (if different from above) SameAmount of Hazardous Waste Generated per Month: 12259 Pounds _____ Kgs

1. Site Characterization:

STORAGE: ☒ Container ☒ Tanks ☐ Containment Bldg. ☐ Drip Pad Other _____PBR: ☒ Neutralization/WWTP ☐ Reclaim Other _____GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad2. Universal Waste: ☐ Large Quantity Handler ☒ Small Quantity HandlerUniversal Waste Types fluorescent tubes → AER

3. Hazardous Waste Transporters:

Transporter Name Enviro of Ohio License Number PAAH 0548

Transporter Name _____ License Number _____

Transporter Name _____ License Number _____

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
<u>F006</u>	<u>wwtp electroplating sludge</u>	<u>Enviro Canton Oh</u>
<u>D002, P001</u>	<u>lab packs</u>	<u>Chemtron Avon Oh</u>
<u>D001, F003</u>	<u>solvents</u>	<u>Pure Tech Systems</u>
<u>P001</u>	<u>spent chlorinated solvent</u>	<u>Cleveland Solvent</u>

F003
D002
27, 29
F001

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name Powerex Inc ID Number PAD005000518 Date 6-15-01

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
/				Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
/				Identification Number	262a.10	262.12	H002
/				Authorized transporters only	262a.10	262.12(c)	H003
/				Subsequent notification requirements met	262a.12(b)		H004
/				Proper manifest used	262a.10	262.21	H005
/				Manifests filled out correctly and completely	262a.20		H006
/				Manifests signed and routed properly	262a.23(a)	262.23	H007
/				Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
	/			SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
	/			SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
/				Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
/				Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
/				Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
/				Specified records retained for three years	262a.10	262.40(c)	H014
	/			Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
		/		Exception reporting procedures followed	262a.42	262.42	H016
/				Spill reporting procedures followed	262a.10	262.34(d)	H017
/				PPC plan developed and implemented	262a.10	262.34(a)	H018
	/			Special requirements followed for international shipments	262a.10	262.50 262.60	H019
		/		Source reduction strategy prepared and available (LQG only)	262a.100		H020
/				Excluded waste complies with exclusionary requirements	261a.4	261.4	H021

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS
FACILITY SPECIFICS

Site Name Powerex Inc ID Number PAD005000518 Date 6-15-01
1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
				LQG TANKS (Subchapter J)			
✓				Tanks labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H040
	✓			Written certification by registered professional engineer for proper tank (system) design and installation on file	262a.10	265.192(a)	H041
	✓			Secondary containment provided for tanks (systems) as required	265a.193	265.193	H042
	✓			Tanks (systems) managed to prevent rupture, leak, corrode or fail	265a.1	265.194	H043
	✓			Tanks labeled to accurately identify contents	265a.194		H044
	✓			Required inspections completed and documented in operating log	265a.195	265.195	H045
	✓			Release reported to Department within 24 hours, unless exempted	265a.1	265.196	H046
	✓			Special requirements for ignitable and reactive wastes followed	265a.1	265.198	H047
	✓			Special small quantity generator requirements	265a.1	265.201	H048
				SQG TANKS			
	✓			Waste contents compatible with tank	265a.1	265.201(b)(2)	H051
	✓			Uncovered tanks operated with 2 feet of freeboard or equivalent containment capacity	265a.1	265.201(b)(3)	H052
	✓			If continuously fed, tank has method to stop inflow	265a.1	265.201(b)(4)	H053
	✓			Daily tank inspection requirements complied with	265a.1	265.201(c)(1-3)	H054
	✓			Weekly tank inspection requirements complied with	265a.1	265.201(c)(4,5)	H055
	✓			All waste removed at closure	265a.1	265.201(d)	H056
	✓			Special requirements for ignitable or reactive waste complied with	265a.1	265.201(e)(1)	H057
	✓			Covered tank buffer zone requirements complied with	265a.1	265.201(e)(2)	H058
	✓			Incompatible waste requirements met	265a.1	265.201(f)	H059

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BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS
FACILITY SPECIFICS

Site Name Powerex Inc ID Number PA0005000 518 Date 6-15-01

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				CONTAINERS (Subchapter I)			
/				Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
/				Containers of hazardous waste in good condition	265a.1	265.171	H026
/				Containers and stored waste compatible	265a.1	265.172	H027
/				Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
/				Containers managed to prevent leaks	265a.1	265.173(b)	H029
/				Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
/				Container storage areas inspected at least weekly	265a.1	265.174	H031
/				Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
/				Proper containment and collection systems in place	265a.179		H033
/				Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
/				Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
/				Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
/				Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037

**Hazardous Waste Inspection Report
Land Disposal Restriction Supplemental Checklist**

6-15-01

Power

1-No Violation Observed				2-Not Applicable	3-Not Determined	4-Non-Compliance
Status				REQUIREMENT		Citation
1	2	3	4			40 CFR Part 268
				Generators		
✓				Notification sent with shipments of wastes that do not meet treatment standards.		7(a)(1)
✓				Notification and certification sent with shipments of wastes meeting treatment standards.		7(a)(2)
✓				Dilution not used as a substitute for treatment.		3
✓				Records maintained of notifications, certifications, waste analysis, and documentation supporting use of knowledge for waste classification.		7(a)(5), (a)(6)
				Storage Facilities		
✓				Facility verifies generators classification of waste in accordance with waste analysis plan.		25 Pa Code 265.13(c)
○				Containers marked to identify contents and accumulation date.		50(a)(2)
				Notification sent with shipments of wastes that do not meet treatment standards.		7(a)(1)
				Notification and certification sent with shipments of wastes meeting treatment standards.		7(a)(2)
				Facility maintains records of documents produced pursuant to LDR requirements.		7(a)(6)
				Treatment Facilities, including PBR and RRR Facilities		
✓				Dilution not used as a substitute for treatment.		3
✓				Facility tests wastes or treatment residues to determine compliance with applicable treatment standards in accordance with waste analysis plan.		7(b)
	✓			Certification and/or notification sent with shipments of waste.		7(b)(4), (b)(5), (b)(6)
				Land Disposal Facilities		
○				Facility tests wastes received to assure compliance with applicable treatment standards.		7(c)(2)
				Facility land disposes of restricted waste only if it meets applicable treatment standard.		40
				Facility retains copies of generator notifications and certifications.		7(c)(1)

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 6-15-01 Identification Number PAD005000 518
Company/Facility/Site Name Powerex, Inc

a) Observations

1) A review was made of the draft remediation plan for the former equalization basin leak. Delta Environmental Consultants, Inc. took samples at 11 locations at two foot intervals to a depth of rejection by rock strata. 17 subsamples were analyzed at six of those locations. Silver (total) results were submitted for each all of which showed < 0.20 mg/kg. While these are encouraging results, none were sampled for nickel. Both of these metals were shown to be above background results when initially sampled. Piles of contaminated soil remain on site. My record indicate that the release to the ground and groundwater occurred on 7-9-99. This release needs to be cleaned up to background or Act 2 limits. If you go Act 2, then you need to include a groundwater investigation in addition to all required soil sampling parameters.

The fencing required by permit by rule for the wastewater treatment unit have not been met yet due to the above prolonged sampling & remediation in the rear of the unit. The use of cloth bags to collect and ship

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein; or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) _____ Date _____
Inspector (signature) Gerald Thynor Date 6-27-01

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 6-15-01 Identification Number PAD005000518

Company/Facility/Site Name Powertex, Inc.

Observations (cont)

The dewatered F006 sludge is reportedly a good substitute for the rolloff box. Minor adjustments in the bag supports have been made to place them under the plate press. The daily operational records were reviewed which indicate that treatment of the electroplating wastewater is meeting NPDES limits without incident. A review of 25 Pa Code, Section 270a.60 permit by rule, subsection (b)(1) applies to treatment of the F006 sludge at the wastewater treatment unit, rather than (b)(2) which applies to tanks not part of a w.t.u. Under the (b)(1) section, tank certification found in 40 CFR Chapter 264, Subchapter J is not required. Accordingly, the violation to Section 264.191 as identified on inspection reports dated 6-3-00 & 3-28-01 should be deleted. Accordingly, the violation on a notice of violation letter dated 4-20-01 referencing 265a.191 should be deleted. Manifests were not immediately available for review on this date. A reinspection will be conducted to review manifests completed since my 3-28-01 inspection. The previous manifest violation

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Person interviewed (signature) _____

Date _____

Inspector (signature) _____

Date _____

6-27-01

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection

6-25-01

Identification Number

PA0005000 518

Company/Facility/Site Name

Powerex, Inc

was the result of an improper hazardous waste determination. The m- bromide degreaser solution was rejected due to the presence of 111 Trichloroethane. You need to identify how the F001 entered the otherwise nonhazardous solvent. Andy Varga plans to test the solvent for the presence of trichlor. and to determine if it entered before or after the reclaimed solvent was returned to this facility. To confirm completion of this, you should send me a copy of a revised hazardous waste determination along with any analysis to support it. An inspection of the electroplating line and the semiconductor assembly lines were completed with Andy Varga and Don Elder. Some of the signs on the electroplating lines appeared dated or missing, but none of the containers or tanks appeared to contain waste. There did not appear to be any excessive accumulation of hazardous waste in the down accumulation area outside.

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Person interviewed (signature)

Gerald Anyon

Date

Date

6-28-01

Inspector (signature)

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 6-15-01 Identification Number PAD605000518

Company/Facility/Site Name Powerex, Inc

B Violations

- 1) Under 25 Pa Code 270a.60, permit by rule provisions you are required to comply with 40 CFR 264.14(b)(2) as incorporated by reference in 264a.1. You should replace the missing section of fencing around the rear of your wastewater treatment unit which was removed in 1999 due to a wastewater leak. You should replace this artificial barrier or provide 24 hour surveillance by guards or facility personnel.
- 2) The manifest violation identified on 3-28-01 related to the 10-24-00 shipment of F001 as a non regulated material could not be resolved on this date. Subsequent manifest shipments were not reviewed and a revised waste determination has not been completed yet. This was a violation of 25 Pa Code Section 262a.20.
- 3) The non-hazardous spill of wastewater prior to entering the wastewater treatment unit has not been completed yet. A remediation of the site or removal of contaminated soil has not been completed yet since the 7-9-99 spill. Disposal of a solid waste is a violation of 25 Pa Code Section 301, 301a & 610(1).

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Person interviewed (signature) _____

Date _____

Inspector (signature) _____

Date 6-28-01